

# EXHIBIT B

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By Y. Tarasyuk, Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S NOTICE OF APPLICATION AND APPLICATION TO (1) COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND SANCTIONS OR (2) ALTERNATIVELY SHORTEN TIME REGARDING A NOTICED MOTION FOR THE SAME RELIEF; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF**

Date: June 26, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Declaration of Matthew T. Hale; [Proposed] Order]*

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 26, 2025, at 8:30 a.m., in Department 71 of Stanley  
3 Mosk Courthouse at 111 N. Hill Street, Los Angeles, California 90012, or as soon thereafter as the  
4 matter can be heard, plaintiff Asta Jonasson will and hereby does apply to the Court for an order  
5 compelling Defendant Vin Diesel to appear for his deposition and for Defendant Vin Diesel and his  
6 counsel, Liner Freedman Taitelman + Cooley to pay sanctions in the amount of \$5,330.07, which is  
7 the amount reasonably incurred in connection with these proceedings. In the alternative, Plaintiff  
8 seeks an Order Shortening Time Regarding the Notice of a Motion for the Same Relief Pursuant to  
9 *Code of Civ. Proc.*, § 1005(b). A copy of Plaintiff's Motion to Compel the Deposition, set for hearing  
10 on August 11, 2025, to be filed contemporaneously with this application, is attached as Exhibit 13  
11 to the Declaration of Matthew T. Hale. (Hale Decl., ¶ 23, Exh. 13.)

12 Good cause exists for the above relief for the following reasons:

- 13 1. Defendant Vin Diesel has failed to appear for his properly noticed deposition  
14 scheduled for June 24-25, 2025, despite previously confirming his availability and  
15 the parties' agreement on the date and time, constituting a failure to submit to an  
16 authorized method of discovery in violation of Code of Civil Procedure section  
17 2025.450(a).
- 18 2. With fact discovery closing on July 18, 2025, and trial set for August 18, 2025,  
19 Defendant's continued evasion through meritless objections and last-minute  
20 unavailability claims threatens irreparable prejudice to Plaintiff's ability to obtain  
21 essential testimony from the primary defendant needed to prosecute her sexual  
22 assault and wrongful termination claims at trial.
- 23 3. Defendant and his counsel have engaged in willful misuse of the discovery process  
24 through unmeritorious objections, obstructionist tactics, and unprofessional conduct,  
25 warranting the imposition of monetary sanctions under Code of Civil Procedure  
26 sections 2023.030(a), 2023.010(d), and 2023.010(e).

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1 This application will be based on Code of Civil Procedure sections 2025.450(a), 2017.010,  
2 2023.030(a), 2023.010(d), and 2023.010(e), the following Memorandum of Points and Authorities,  
3 Declaration of Matthew T. Hale, and exhibits filed along with these papers, and other evidence to  
4 be presented at the hearing on this motion.

5  
6 DATED: June 25, 2025

GREENBERG GROSS LLP

7  
8 By: /s/ Matthew T. Hale

9 Brian L. Williams

10 Jemma E. Dunn

11 Matthew T. Hale

12 Attorneys for Plaintiff Asta Jonasson  
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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

This case arises from Plaintiff Asta Jonasson's allegations that Defendant Vin Diesel sexually assaulted her in September 2010 while she was working as his assistant during the production of "Fast Five," and that she was terminated the following day in retaliation for resisting the assault. Empowered by recent legislative changes, Plaintiff filed this lawsuit on December 21, 2023, seeking legal relief for the alleged sexual assault and wrongful termination under Code of Civil Procedure, § 340.16.

Defendant Vin Diesel has systematically evaded deposition for over a year through meritless objections and last-minute unavailability claims, despite previously confirming his availability for June 24-25, 2025. With fact discovery closing on July 18, 2025, and trial set for August 18, 2025, Defendant's obstructionist tactics—including his counsel's unprofessional conduct involving profanity and physical threats during counsels' meet and confer session—threaten to deny Plaintiff the essential testimony of the primary defendant needed to prosecute her claims at trial.

Plaintiff respectfully requests that this Court grant this *ex parte* application to compel Defendant Vin Diesel's deposition before the discovery cutoff, impose monetary sanctions in the amount of \$5,330.07 against Defendant and his counsel for their willful abuse of the discovery process, and provide such other relief as the Court deems just and proper to prevent irreparable prejudice to Plaintiff's ability to present her case at trial.

**II. FACTUAL BACKGROUND**

**A. Defendant Vin Diesel's Testimony is Essential to the Prosecution of Plaintiff's Matter**

In September 2010, Plaintiff Asta Jonasson was hired by Defendants as an assistant working directly for Defendant Vin Diesel during the production of "Fast Five." (Compl., p. 2, ¶ 1.) Shortly after beginning her employment, on or about September 10, 2010, Plaintiff alleges that Defendant Diesel sexually assaulted her in his hotel suite at the St. Regis Hotel in Atlanta, Georgia. (Compl., p. 10, ¶¶ 29-30.) The following day, on or about September 11, 2010, Plaintiff was terminated from her position when Samantha Vincent, President of One Race and Defendant Diesel's sister, called

1 Plaintiff and stated that One Race no longer needed “any extra help.” (Compl., p. 11, ¶ 32.)

2 For years following the alleged incident, Plaintiff remained silent about the sexual assault.  
3 She was afraid to speak out against a high-profile actor, concerned about being ostracized from the  
4 industry, and worried that as a green card holder, speaking out could jeopardize her potential future  
5 citizenship. (Compl., p. 3, ¶ 7.) Additionally, One Race required all employees to sign non-  
6 disclosure agreements, further limiting Plaintiff’s ability to discuss matters related to her  
7 employment and Defendant Diesel. (Compl., p. 3, ¶ 7.)

8 Recently empowered by the #MeToo and Time’s Up movements, and with the protection of  
9 the Speak Out Act and the revival of her claims under California Assembly Bill 2777 (AB 2777),  
10 Plaintiff is now seeking legal relief for the alleged sexual assault and subsequent termination of her  
11 employment. (Compl., p. 4, ¶ 7.)

12 This lawsuit was filed on December 21, 2023, pursuant to Code of Civil Procedure § 340.16,  
13 as amended by Assembly Bill 2777. Trial in this matter is scheduled for August 18, 2025.

14 **B. Defendant Vin Diesel Has Repeatedly Evaded Deposition Despite Multiple**  
15 **Notices and Good Faith Efforts To Accommodate His Schedule.**

16 Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024.  
17 (See Declaration of Matthew T. Hale (“Hale Decl.”), ¶ 2, Exh. 1.) On May 1, 2024, Defendant  
18 served his objection to the notice of deposition, indicating in part that neither he nor his counsel  
19 were available on that date. (Hale Decl., ¶ 3, Exh. 2.)

20 On April 7, 2025, Plaintiff again noticed Mr. Diesel’s deposition, this time for April 29,  
21 2025. (Hale Decl., ¶ 4, Exh. 3.) Plaintiff accompanied the notice of deposition with a letter  
22 requesting alternative dates if April 29, 2025 did not work for Mr. Diesel or his attorneys. (Hale  
23 Decl., ¶ 5, Exh. 4.) No response was received to that letter until Mr. Diesel’s objections to the  
24 deposition notice were served via overnight mail on April 24, 2025. (Hale Decl., ¶ 6, Exh. 5.)

25 Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the  
26 objections to Mr. Diesel’s deposition notice. (Hale Decl., ¶ 7, Exh. 6.) This letter addressed Mr.  
27 Diesel’s objections in detail, each of which was unmeritorious. Following discussion on this letter,  
28 counsel for Defendant Vin Diesel confirmed that he would appear for his deposition in person on

1 June 24 and June 25. (Hale Decl., ¶ 8, Exh. 7.) On May 13, 2025, Plaintiff’s counsel emailed counsel  
 2 for Defendant confirming that the deposition would be held at Plaintiff’s office in downtown Los  
 3 Angeles and to inform Plaintiff’s counsel immediately if this was an issue. (Hale Decl., ¶ 9, Exh.  
 4 8.) That same date, May 13, 2025, Plaintiff served the notice of deposition of Defendant Vin Diesel  
 5 to be conducted at Plaintiff counsel’s Los Angeles office for June 24 and June 25. (Hale Decl., ¶  
 6 10, Exh. 9.)

7 **C. Defendant Vin Diesel Served Nearly Identical Objections Just Four Days Before**  
 8 **His Scheduled Deposition Despite Previously Confirming His Availability.**

9 On June 20, 2025, counsel for Defendant Vin Diesel served via personal service its  
 10 objections to Plaintiff’s deposition notice, served on May 13, 2025. (Hale Decl., ¶ 11, Exh. 10.)  
 11 This objection document closely resembled the prior objection document from April 2025, including  
 12 five of the same eight objections. (See Hale Decl. ¶ 6, Exh. 5.) The unique objections related to Vin  
 13 Diesel’s unavailability, the scope of the deposition, and alleged inadequacies of Plaintiff counsel’s  
 14 office to “protect Defendant’s personal safety and privacy.” (*Ibid.*) Plaintiff’s counsel had  
 15 previously conducted in-person depositions in this matter at Plaintiff counsel’s Los Angeles office  
 16 on May 28, 2025 and June 19, 2025. (Hale Decl., ¶ 12.)

17 That same day, June 20, 2025, Plaintiff’s counsel responded via email, meeting and  
 18 conferring regarding each objection and requesting alternative dates before the fact discovery cutoff  
 19 (July 18, 2025), given Vin Diesel’s asserted unavailability. (Hale Decl., ¶ 13, Exh. 11.)

20 **D. Defendant’s Counsel Engaged In Obstructionist Tactics, Including Physical**  
 21 **Threats And Profanity, While Refusing To Provide Any Legitimate Reason For**  
 22 **Vin Diesel’s Last-Minute Unavailability.**

23 Plaintiff’s counsel was scheduled to take the in-person deposition of third party witness  
 24 Valentino Morales on June 23, 2025. (Hale Decl., ¶ 14.) The morning of this deposition, counsel for  
 25 Defendant Vin Diesel asserted that they disagreed with Plaintiff counsel’s position regarding Vin  
 26 Diesel’s objections to his duly noticed deposition and would meet and confer in person, later that  
 27 day, on June 23, 2025. (Hale Decl., ¶ 15, Exh. 12.)

28 Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third party

1 deponent on June 23, 2025. (Hale Decl., ¶ 16.) Prior to the deposition, Plaintiff's counsel Matthew  
2 Hale requested to meet and confer about the objections to the deposition of Vin Diesel in a separate  
3 room. (*Ibid.*) Mr. Hale and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly  
4 unavailable for his deposition. (*Ibid.*) Mr. Hale requested to know why Mr. Diesel was suddenly  
5 unavailable, and Mr. Hardy refused to provide a reason. (*Ibid.*)

6 During this back and forth, Mr. Freedman entered the room. (Hale Decl., ¶ 17.) Mr. Hale  
7 again requested to know why Mr. Diesel was unavailable to determine if this was a true emergency  
8 or a simple failure to appear for his deposition, for which availability had been cleared over a month  
9 prior, as it would be important for the purposes of any motion to compel that may need to be filed.  
10 (*Ibid.*) Counsel for Defendant continued to refuse to provide any explanation. (*Ibid.*) Mr. Freedman  
11 interjected and told Mr. Hale to just file his motion and called Mr. Hale, a "moron" and cursed while  
12 doing so. (*Ibid.*) Mr. Hale began to write down the language on note paper, specifically stating that  
13 he would be including these insults in his declaration to any Motion and requesting to have a  
14 professional and substantive meet and confer. (*Ibid.*) Mr. Freedman then threatened Mr. Hale with  
15 malicious prosecution and called him a "piece of shit." (*Ibid.*) At no time did Mr. Hale exchange  
16 any insult with Mr. Freedman, raise his voice, or provoke any physical contact. (*Ibid.*) Shortly  
17 thereafter, Mr. Freedman got up from his chair, rushed to stand directly in front of Mr. Hale, mere  
18 inches away from him, causing Mr. Freedman's face to be directly in front of that of Mr. Hale.  
19 (*Ibid.*) Mr. Freedman then called Mr. Hale a "pussy" and swung his fist at Mr. Hale's face, stopping  
20 directly in front of his face, without making contact. (*Ibid.*) Shocked, Mr. Hale nonetheless remained  
21 composed and attempted to address Mr. Hardy behind Mr. Freedman, in hopes that counsel could  
22 get the meet and confer discussion back on track. (*Ibid.*) At some point shortly thereafter, Mr.  
23 Freedman left the room, and Mr. Hale and Mr. Hardy conducted the meet and confer session, both  
24 then and after the deposition concluded later that day. (*Ibid.*)

25 Given Mr. Diesel's asserted objection regarding the lack of security and privacy at Plaintiff's  
26 counsel's office, Mr. Hale requested to know what was deficient about their security and/or privacy.  
27 (Hale Decl., ¶ 18.) Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed  
28 to be able to quickly leave the deposition for his security, including in relation to death threats,

1 without having to go down thirty floors and obtain his vehicle from an underground parking lot.  
 2 (*Ibid.*) Mr. Hardy also asserted that Mr. Diesel would need his personal security with him. (*Ibid.*)

3 Mr. Hale then offered to conduct the next day's deposition at defense counsel's office. (Hale  
 4 Decl., ¶ 19.) Mr. Hardy again asserted that Mr. Diesel was not in the city. (*Ibid.*) Mr. Hale asked  
 5 when Mr. Diesel left the city and where he was, but Mr. Hardy would not provide that information.  
 6 (*Ibid.*) Mr. Hardy laid out several conditions for a rescheduled deposition of Vin Diesel: (1) that the  
 7 deposition be conducted for no more than seven hours; (2) that a protective order be in place to  
 8 protect Defendant's financial, medical, and sexual privacy; (3) that the deposition take place at  
 9 defense counsel's office or remotely; and (4) that the deposition only occur following the hearing  
 10 on Defendant's just-filed Motion for Summary Judgment/Adjudication, set for October 7, 2025,  
 11 nearly two months after the current trial date of August 18, 2025. (*Ibid.*)

12 At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties further  
 13 met and conferred, at an Informal Discovery Conference, or in any other venue. (Hale Decl., ¶ 20.)

#### 14 **E. Defendant's Filing of a Motion for Protective Order**

15 On the same date, June 23, 2025, Defendant Vin Diesel filed a Motion for Protective Order  
 16 on the same subset of four (4) grounds listed immediately above. As will be argued below, these  
 17 grounds are unmeritorious.

### 18 **III. LEGAL STANDARD**

#### 19 **A. Ex Parte Application Standard**

20 California Rules of Court, rule 3.1202 governs *ex parte* applications and establishes the  
 21 requirements that must be satisfied before a court may grant relief without notice to opposing parties.  
 22 Under rule 3.1202(c), an *ex parte* application may only be granted upon an affirmative factual  
 23 showing that there is immediate danger, irreparable harm, or immediate loss or damage to property.  
 24 The rule specifically provides that "[a] showing of irreparable harm or immediate danger must be  
 25 made by affidavit based on admissible evidence."

#### 26 **B. Standard for Motions to Compel Deposition**

27 Code of Civ. Proc., § 2025.450(a) provides as follows:

28 If, after service of a deposition notice, a party to the action or an officer, director,

managing agent, or employee of a party, or a person designated by an organization that is a party under Section 2025.230, without having served a valid objection under Section 2025.410, fails to appear for examination, or to proceed with it, or to produce for inspection any document or tangible thing described in the deposition notice, the party giving the notice may move for an order compelling the deponent's attendance and testimony, and the production for inspection of any document or tangible thing described in the deposition notice.

#### IV. **ARGUMENT**

##### A. **Defendant Vin Diesel's Objections to his Notice of Deposition are Invalid and Unmeritorious.**

##### 1. **Defendant Vin Diesel's Asserted Unavailability**

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel, for the first time since his counsel provided his availability for an in-person deposition on May 9, 2025, asserted that he was not available for his deposition. (Hale Decl., ¶ 11, Exh. 10, p. 1) Neither in writing nor verbally through his counsel did Defendant communicate any true emergency to explain his availability. In fact, Mr. Diesel's counsel indicated that he was not even "in the city." Mr. Diesel's counsel declined to provide any further detail. When Plaintiff's counsel offered to conduct the deposition at defense counsel's office, as requested by Mr. Diesel, defense counsel again asserted Mr. Diesel was not "in the city."

Furthermore, "unavailability" is not an adequate objection to a duly-served deposition notice. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure section 2025.210 *et seq.* With fact discovery closing on July 18, 2025, and trial set for August 18, 2025, Defendant's last-minute unavailability represents a deliberate attempt to run out the clock on discovery. Every day of delay brings Plaintiff closer to being forced to trial without the critical testimony of the key defendant, resulting in irreparable prejudice to Plaintiff's ability to prosecute her claims. Defendant's continued reliance on this meritless objection as discovery closes threatens to deny Plaintiff essential testimony needed for trial preparation.

## 2. In-Person Attendance

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that he cannot be required to attend his deposition in-person, pursuant to *Code of Civ. Proc.*, § 2025.310(a). (Hale Decl., ¶ 11, Exh. 10, p. 1.) However, as pointed out to counsel in previous meet and confer discussions regarding an identical objection to a prior notice of deposition of Mr. Diesel, this is a misreading of that code section.

CCP § 2025.310(a) states as follows: "At the election of the deponent or the deposing party, the deposition officer may attend the deposition at a different location than the deponent via remote means. A deponent is not required to be physically present with the deposition officer when being sworn in at the time of the deposition." Thus, the code section permits the deposition officer, i.e., the court reporter, to attend the deposition via remote means. No reference is made to the deponent's ability to elect a remote appearance.

CCP § 2025.310(b), which Mr. Diesel did not cite in his objection, states as follows: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent. If a party or attorney of record elects to be physically present at the location of the deponent, all physically present participants in the deposition shall comply with local health and safety ordinances, rules, and orders." This code section similarly does not permit Mr. Diesel to elect a remote appearance; it merely allows Mr. Diesel, or his attorney of record, to be physically present at the location of another deponent. Of course, this supports Plaintiff's position, as Plaintiff and her attorney of record may be physically present at the deposition of the deponent in this scenario: Vin Diesel. With less than one month remaining before the discovery cutoff, Defendant's frivolous location objection threatens to prevent Plaintiff from obtaining critical testimony altogether.

## 3. Location of Deposition

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that he should not have to attend a deposition "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." (Hale Decl., ¶ 11, Exh. 10, p. 1.) Mr. Diesel failed to even straightforwardly assert that he in fact lives more than 150 miles from Plaintiff's counsel's office in



1 downtown Los Angeles, where the deposition is to take place. Mr. Diesel's objection is so vague  
2 and uncertain as to operate as a waiver of any such objection.

3 Furthermore, Samantha Vincent – Mr. Diesel's sister – and Valentino Morales – Mr. Diesel's  
4 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
5 Los Angeles, California. (Hale Decl., ¶ 21.) Defendant's suggestion to hold the deposition at defense  
6 counsel's office in Century City also confirms the convenience of Los Angeles as a location for Mr.  
7 Diesel's deposition.

8 Finally, Plaintiff's counsel repeatedly requested confirmation on this topic from defense  
9 counsel but was not provided with any. As recently as May 13, 2025, Plaintiff's counsel requested  
10 to confirm that the in-person location of Vin Diesel's June 24 and 25 deposition was to be Los  
11 Angeles, specifically Plaintiff's counsel's Los Angeles office. (Hale Decl., ¶ 9, Exh 8.) Of course,  
12 this is Plaintiff's choice to begin with, but Plaintiff extended this question as a courtesy, which  
13 received no response from defense counsel.

14 With less than one month remaining before the discovery cutoff, Defendant's frivolous  
15 location objection threatens to prevent Plaintiff from obtaining critical testimony altogether.

#### 16 **4. Time Limit**

17 Defendant Diesel also objected that his deposition should be limited to seven-hours under  
18 CCP § 2025.290. (Hale Decl., ¶ 11, Exh. 10, p. 1.) Pursuant to CCP § 2025.290(b)(4), depositions  
19 in employment matters are excepted from the default seven-hour limit. While Plaintiff's FEHA  
20 claims have indeed been dismissed, multiple employment claims still remain, including Retaliation  
21 in Violation of Labor Code, §§ 98.6, 1102.5 and Wrongful Termination in Violation of Public  
22 Policy.

23 Further, the notice of deposition does not assume any particular total time to be on the record.  
24 A full day of deposition rarely equates to seven hours on the record.

25 Given the compressed timeframe before the discovery cutoff and trial, artificial time  
26 limitations would further prejudice Plaintiff's ability to obtain complete testimony on the complex  
27 issues underlying this sexual assault case.



## 5. Questions Implicating Privacy

“[A]ny party may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter involved in the pending action or to the determination of any motion made in that action, if the matter either is itself admissible in evidence or appears reasonably calculated to lead to the discovery of admissible evidence.” (*Code Civ. Proc.*, § 2017.010.) “‘Relevant’ evidence is evidence ‘having any tendency in reason to prove or disprove any disputed fact that is of consequence to the determination of the action.’” (*D.Z. v. Los Angeles Unified School Dist.* (2019) 35 Cal.App.5th 210, 229.) “The party asserting a privacy right must establish a legally protected privacy interest, an objectively reasonable expectation of privacy in the given circumstances, and a threatened intrusion that is serious.” (*Williams v. Sup. Ct.* (2017) 3 Cal.5th 531, 552.) If the court finds a privacy interest, the court must balance the privacy concerns against the need for the information. (*Id.* at p. 552.)

Defendant Vin Diesel asserts that he should not have to attend his deposition because questions *may* be asked that implicate his privacy, including his sexual history and financial condition. (Hale Decl., ¶ 11, Exh. 10, p. 1.)

First, as to Defendant’s financial condition, Plaintiff is already not permitted to seek pretrial discovery on this subject. (*Civ. Code*, § 3295(a)(2).) As such, a protective order is altogether unnecessary. On the contrary, Plaintiff must request an order permitting such discovery to obtain it pretrial. Plaintiff has not and does not plan on doing so. Defendant cannot be permitted to delay his deposition by simply listing subjects to which Plaintiff never had the intention or ability to inquire about.

Second, as to Mr. Diesel’s “sexual history,” it is unclear as to what Defendant is referring, given the ambiguity of the phrase. As asserted in Mr. Diesel’s summary judgment motion, set to be heard after trial, Plaintiff relies on *Code of Civ. Proc.*, § 340.16 to revive her claims based on wrongful conduct in 2010. With regard to claims revived by *Code of Civ. Proc.*, § 340.16(e), Plaintiff must allege the following:

(A) The plaintiff was sexually assaulted.

(B) One or more entities are legally responsible for damages arising out of the

1 sexual assault.

2 (C) The entity or entities, including, but not limited to, their officers, directors,  
3 representatives, employees, or agents, engaged in a cover up or attempted a cover  
4 up of a previous instance or allegations of sexual assault by an alleged perpetrator  
5 of such abuse.

6 As such, questions regarding previous instances of sexual assault by Mr. Diesel are  
7 reasonably calculated to lead to the discovery of admissible evidence. Now, Mr. Diesel seeks to  
8 prevent Plaintiff from even *seeking* essential discovery, while at the same time attempting to dismiss  
9 her claims for lack of that same sought-for evidence. That said, Plaintiff is not interested in Mr.  
10 Diesel's "sexual history" wholesale. An order preventing all investigation into anything sexual with  
11 regard to Vin Diesel would necessarily prevent Plaintiff from asking questions directed toward Mr.  
12 Diesel about accusations of sexual assault or abuse previously committed by him. A stipulated  
13 protective order ("SPO") in this matter has been in place since July 25, 2024. Any particular  
14 questions that Defendant or his counsel believe run afield are better addressed on a question-by-  
15 question basis, at which time counsel may simply instruct their client not to answer. All testimony  
16 will have the protection of the parties' protective order, so long as Defendant labels it as confidential,  
17 subject to the procedure in the parties' SPO to de-designate as confidential any testimony. In this  
18 scenario, a specialized protective order is a blunt tool that would prevent Plaintiff from seeking  
19 essential discovery.

20 In his recently filed Motion for Protective Order, Mr. Diesel adds multiple other types of  
21 privacy to the list, including medical and psychotherapeutic. Plaintiff has no interest in discovery  
22 on these topics, and Defendant has provided no examples of what it may be concerned about Plaintiff  
23 inquiring into. Again, Defendant cannot be permitted to delay his deposition by simply listing  
24 subjects to which Plaintiff never had the intention to inquire about and asking the Court to hear that  
25 Motion months after the parties' August 2025 trial date.

26 Finally, Defendant also adds "employment history" to the list of private topics that may not  
27 be inquired about. Defendant fails to define precisely what is meant by the ambiguous phrase.  
28 Plaintiff was employed by Defendant and his entities, so to the extent "employment history" refers

1 to Vin Diesel's employment with Defendants One Race Films, Inc. or One Race Productions, Inc.,  
2 such topics are squarely discoverable. Other than this, Plaintiff has little interest in probing into  
3 Mr. Diesel's career path, which is already publicly known.

#### 4 **6. Safety**

5 In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that Plaintiff's office  
6 is "inadequate to protect Defendant's personal safety and privacy." (Hale Decl., ¶ 11, Exh. 10, p. 2.)  
7 As is known by Defendants' counsel, Plaintiff's counsel's office is located in the PwC building on  
8 7<sup>th</sup> and Figueroa, which is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. (Hale Decl. ¶  
9 22.) Like many buildings downtown, it has multiple 24/7 dedicated security personnel. (*Ibid.*)  
10 Entrance is restricted per floor, and visitors may only access a particular floor if they have been  
11 added to a security list and been ushered to an appropriate elevator by security. (*Ibid.*) During a meet  
12 and confer session with Defense counsel, Sean Hardy explained that the concern was more about  
13 the quickness with which Mr. Diesel could descend from the 30<sup>th</sup> floor and retrieve his vehicle from  
14 the building's underground parking. (Hale Decl. ¶ 18.) This is not a reasonable or rational basis for  
15 failing to attend a deposition. Further, no explanation was provided with relation to the building's  
16 inability to protect Defendant's privacy, so this is still a mystery.

17 During the in-person meet and confer, Plaintiff's counsel offered as a compromise to conduct  
18 the deposition at the office of defense counsel. (Hale Decl. ¶ 19.) Defense counsel stated that  
19 nonetheless, Mr. Diesel was "not in the city" and so would not be attending. (*Ibid.*)

20 These shifting and contradictory excuses demonstrate Defendant's bad faith attempts to  
21 avoid deposition entirely as the discovery deadline approaches, threatening irreparable harm to  
22 Plaintiff's trial preparation.

#### 23 **7. Vague Procedural Deficiencies**

24 Mr. Diesel also objected "to the extent [the deposition notice] fails to comply with the  
25 requirements on Code of Civil Procedure section 2025.210, *et seq.*" (Hale Decl., ¶ 11, Exh. 10, p.  
26 2.) This objection lacks any specificity as to what requirements the notice fails to comply with, and  
27 no additional detail has been provided by counsel. This objection should be disregarded due to its  
28 vagueness and ambiguity. Such procedural gamesmanship with less than one month before the

1 discovery cutoff constitutes bad faith designed to prevent Plaintiff from obtaining critical testimony.

## 2 **8. Pending Dispositive Motion**

3 Defendant's final objection asserts good cause exists to stay the deposition pending  
 4 Defendant's Motion for Summary Judgment/Adjudication ("MSJ"), which is scheduled to be heard  
 5 on October 7, 2025, nearly two months past the parties' August 18, 2025 trial date. (Hale Decl., ¶  
 6 11, Exh. 10, p. 2.) The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and  
 7 *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal*  
 8 and *Silver* are both cases where a plaintiff had yet to get past the pleadings stage, and each court  
 9 stated that the plaintiff had to state at least one cause of action before discovery or depositions would  
 10 be permitted. Of course, this matter is past the pleadings stage, is deep into fact discovery, and  
 11 testimony sought at the deposition of Vin Diesel is squarely relevant to Plaintiff's preparation for  
 12 Trial. Further, the MSJ should never be heard because it was filed late, and so should not be used as  
 13 a sword to delay discovery and trial itself. Allowing Defendant to use his untimely motion to prevent  
 14 discovery would result in immediate and irreparable harm to Plaintiff, who will be forced to proceed  
 15 to trial on August 18, 2025, without the essential testimony of the primary defendant.

## 16 **B. Plaintiff's Counsel Adequately Notified Defense Counsel Prior to Filing this** 17 **Application.**

18 California Rules of Court, rule 3.1203(a) requires that no *ex parte* application will be  
 19 considered unless the applicant has notified all other parties no later than 10:00 a.m. the court day  
 20 before the *ex parte* appearance. Rule 3.1204(b) requires that an *ex parte* application must be  
 21 accompanied by a declaration regarding notice stating the notice given, including the date, time,  
 22 manner, and name of the party informed, the relief sought, any response, and whether opposition is  
 23 expected.

24 Plaintiff has satisfied the notice requirements of California Rules of Court, rule 3.1204. Mr.  
 25 Hale gave notice of this *ex parte* application to defense counsel Sean Hardy via email on Thursday,  
 26 June 26, 2025. (Hale Decl. ¶ 31, Exh. 14.) Mr. Hale specifically stated that the hearing would take  
 27 place at 8:30 a.m. on Friday, June 27, 2025 in Department 71 of the Stanley Mosk Courthouse  
 28 located at 111 North Hill Street, Los Angeles, California 90012 and described the date, time, place

1 for the presentation of the application, the relief sought, and inquired whether opposition is expected,  
 2 thereby complying with the requirements of rule 3.1204. Defendant’s counsel indicated it would  
 3 oppose the instant application. (*Ibid.*)

4 **C. Monetary Sanctions Are Appropriate Due to Defendant’s Misuse of the**  
 5 **Discovery Process.**

6 California Code of Civil Procedure section 2023.030(a) provides that “[t]he court may  
 7 impose a monetary sanction ordering that one engaging in the misuse of the discovery process.”  
 8 California Code of Civil Procedure section 2023.010(d) provides that “[f]ailing to respond or to  
 9 submit to an authorized method of discovery” constitutes misuse of the discovery process.  
 10 California Code of Civil Procedure section 2023.010(e) provides that “making, without substantial  
 11 justification, an unmeritorious objection to discovery” also constitutes misuse of the discovery  
 12 process.

13 Here, sanctions against Mr. Diesel and his counsel, Liner Freedman Taitelman + Cooley, are  
 14 warranted pursuant to the aforementioned code sections because Defendant has failed to appear for  
 15 his properly noticed deposition. Further, Defendant’s unmeritorious objections and counsel’s  
 16 improper conduct constitute a misuse of the discovery process and failure to respond or to submit  
 17 to an authorized method of discovery.

18 Code of Civil Procedure section 2025.450(g)(1) provides:

19 If a motion under subdivision (a) is granted, *the court shall impose a monetary*  
 20 *sanction* under Chapter 7 (commencing with Section 2023.010) in favor of the  
 21 party who noticed the deposition and against the deponent or the party with whom  
 22 the deponent is affiliated, unless the court finds that the one subject to the sanction  
 23 acted with substantial justification or that other circumstances make the  
 24 imposition of the sanction unjust. (Emphasis added.)

25 Defendants’ conduct is a willful abuse of the discovery process for which Defendant and his  
 26 counsel should be sanctioned. Defendant has failed to appear at his duly noticed deposition, at a  
 27 date and location agreed to by the parties. Under the statutes enumerated above, plaintiff requests  
 28 sanctions in the amount of \$5,330.07 for costs and attorneys’ fees. (Hale Decl. ¶ 29.)

1 **V. CONCLUSION**

2 Based on the foregoing, Plaintiff respectfully requests that this Court grant this *ex parte*  
3 application to compel Defendant Vin Diesel's deposition before the July 18, 2025 discovery cutoff,  
4 impose monetary sanctions against Defendant and his counsel for their willful abuse of the discovery  
5 process, and provide such other relief as the Court deems just and proper.

6  
7 DATED: June 26, 2025

GREENBERG GROSS LLP

8  
9 By: /s/ Matthew T. Hale

10 Brian L. Williams

11 Jemma E. Dunn

Matthew T. Hale

12 Attorneys for Plaintiff Asta Jonasson  
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**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S NOTICE OF APPLICATION AND APPLICATION TO (1) COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND SANCTIONS OR (2) ALTERNATIVELY SHORTEN TIME REGARDING A NOTICED MOTION FOR THE SAME RELIEF; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.  
Sean M. Hardy, Esq.  
Jason H. Sunshine, Esq.

Attorneys for Defendants One Race Films, Inc.,  
One Race Productions, Inc., Vin Diesel f/k/a  
Mark Sinclair Vincent, and Samantha Vincent

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Emails: bfreedman@ftllp.com  
smhardy@ftllp.com  
jsunshine@ftllp.com  
vbirtha@ftllp.com  
cpuello@ftllp.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

\_\_\_\_\_  
Hazelle Nunez

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
6/26/2025 9:59 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By Y. Tarasyuk, Deputy Clerk

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Case No. 23STCV31143

Plaintiff,

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

v.

**DECLARATION OF MATTHEW T.  
HALE IN SUPPORT OF PLAINTIFF'S EX  
PARTE APPLICATION**

VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,

Date: June 26, 2025  
Time: 8:30 a.m.  
Dept.: 71

Defendants.

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Ex Parte Application;  
[Proposed] Order]*



**DECLARATION OF MATTHEW T. HALE**

I, Matthew T. Hale, declare as follows:

1. I am an attorney at law, duly authorized to practice law in the State of California. I am an attorney with the law firm of Greenberg Gross LLP, counsel of record for plaintiff Asta Jonasson (“Plaintiff” or “Jonasson”) in this case. The facts stated herein are within my personal knowledge and if called upon to testify, I can truthfully and competently do so as to all matters herein. I make this declaration in support of Plaintiff Asta Jonasson’s *Ex Parte* Application to compel the deposition of Defendant Vin Diesel and for sanctions, or in the alternative, for an order shortening time on Plaintiff’s Motion for the same relief.

2. Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024. A true and correct copy of that deposition notice is attached hereto as **Exhibit 1**.

3. On May 1, 2024, Defendant Vin Diesel served his objection to the notice of deposition, indicating in part that neither he nor his counsel were available on that date. A true and correct copy of that objection document is attached hereto as **Exhibit 2**.

4. On April 7, 2025, Plaintiff again noticed Mr. Diesel’s deposition, this time for April 29, 2025. A true and correct copy of that deposition notice is attached hereto as **Exhibit 3**.

5. Plaintiff accompanied the notice of deposition with a letter requesting alternative dates if April 29, 2025 did not work for Mr. Diesel or his attorneys. A true and correct copy of that letter is attached hereto as **Exhibit 4**.

6. No response was received to that letter until Mr. Diesel’s objections to the deposition notice were served via overnight mail on April 24, 2025. A true and correct copy of that objection document is attached hereto as **Exhibit 5**.

7. Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the objections to Mr. Diesel’s deposition notice. A true and correct copy of that letter is attached hereto as **Exhibit 6**.

8. Following discussion on this letter, counsel for Defendant Vin Diesel confirmed that he would appear for his deposition in person on June 24 and June 25. A true and correct copy of the confirming email from Jason Sunshine is attached hereto as **Exhibit 7**.

1           9.       On May 13, 2025, Plaintiff's counsel emailed counsel for Defendant confirming that  
2 the deposition would be held at Plaintiff's office downtown Los Angeles and to inform Plaintiff's  
3 counsel immediately if this was an issue. A true and correct copy of the confirming email from  
4 Matthew Hale is attached hereto as **Exhibit 8**.

5           10.      That same date, May 13, 2025, Plaintiff served the notice of deposition of Defendant  
6 Vin Diesel to be conducted at Plaintiff counsel's Los Angeles office for June 24 and June 25., 2025  
7 A true and correct copy of that deposition notice is attached hereto as **Exhibit 9**.

8           11.      On June 20, 2025, counsel for Defendant Vin Diesel served via personal service its  
9 objections to Plaintiff's deposition notice, served on May 13, 2025. A true and correct copy of that  
10 objection document is attached hereto as **Exhibit 10**.

11          12.      Plaintiff's counsel had previously conducted in-person depositions in this matter at  
12 Plaintiff counsel's Los Angeles office on May 28, 2025 and June 19, 2025.

13          13.      That same day, June 20, 2025, Plaintiff's counsel responded via email, meeting and  
14 conferring regarding each objection and requesting alternative dates before the fact discovery cutoff  
15 (July 18, 2025), given Vin Diesel's asserted unavailability. A true and correct copy of that email is  
16 attached hereto as **Exhibit 11**.

17          14.      Plaintiff's counsel was scheduled to take the in-person deposition of third party  
18 witness Valentino Morales on June 23, 2025.

19          15.      The morning of this deposition, counsel for Defendant Vin Diesel asserted that they  
20 disagreed with Plaintiff counsel's position regarding Vin Diesel's objections to his duly noticed  
21 deposition and would meet and confer in person later that day, on June 23, 2025. A true and correct  
22 copy of that email from Sean Hardy is attached hereto as **Exhibit 12**.

23          16.      Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third  
24 party deponent on June 23, 2025. Prior to the deposition, Plaintiff's counsel Matthew Hale requested  
25 to meet and confer about the objections to the deposition of Vin Diesel in a separate room. Mr. Hale  
26 and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly unavailable for his  
27 deposition. Mr. Hale requested to know why Mr. Diesel was suddenly unavailable, and Mr. Hardy  
28 refused to provide a reason.

1           17.     During this back and forth, Mr. Freedman entered the room. Mr. Hale again requested  
2 to know why Mr. Diesel was unavailable to determine if this was a true emergency or a simple  
3 failure to appear for his deposition, for which availability had been cleared over a month prior, as it  
4 would be important for the purposes of any Motion to compel that may need to be filed. Counsel for  
5 Defendant continued to refuse to provide any explanation. Mr. Freedman interjected and told Mr.  
6 Hale to just file his motion and called Mr. Hale, a “moron” and cursed while doing so. Mr. Hale  
7 began to write down the language on note paper, specifically stating that he would be including  
8 these insults in his declaration to any motion and requesting to have a professional and substantive  
9 meet and confer. Mr. Freedman then threatened Mr. Hale with malicious prosecution and called  
10 him a “piece of shit.” At no time did Mr. Hale exchange any insult with Mr. Freedman, raise his  
11 voice, or provoke any physical contact. Shortly thereafter, Mr. Freedman got up from his chair,  
12 rushed to stand directly in front of Mr. Hale, mere inches away from him, causing Mr. Freedman’s  
13 face to be directly in front of that of Mr. Hale. Mr. Freedman then called Mr. Hale a “pussy” and  
14 swung his fist at Mr. Hale’s face, stopping directly in front of his face, without making contact.  
15 Shocked, Mr. Hale nonetheless remained composed and attempted to address Mr. Hardy behind Mr.  
16 Freedman, in hopes that counsel could get the meet and confer discussion back on track. At some  
17 point shortly thereafter, Mr. Freedman left the room, and Mr. Hale and Mr. Hardy conducted the  
18 meet and confer session, both then and after the deposition concluded later that day.

19           18.     Given Mr. Diesel’s asserted objection regarding the lack of security and privacy at  
20 Plaintiff’s counsel’s office, Mr. Hale requested to know what was deficient about their security  
21 and/or privacy. Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed to  
22 be able to quickly leave the deposition for his security, including in relation to death threats, without  
23 having to go down thirty floors and obtain his vehicle from an underground parking lot. Mr. Hardy  
24 also asserted that Mr. Diesel would need his personal security with him.

25           19.     Mr. Hale then offered to conduct the next day’s deposition at defense counsel’s  
26 office. Mr. Hardy again asserted that Mr. Diesel was not in the city. Mr. Hale asked when Mr. Diesel  
27 left the city and where he was, but Mr. Hardy would not provide that information. Mr. Hardy laid  
28 out several conditions for a rescheduled deposition of Vin Diesel: (1) that the deposition be

1 conducted for no more than seven hours; (2) that a protective order be in place to protect Defendant's  
2 financial, medical, and sexual privacy; (3) that the deposition take place at defense counsel's office  
3 or remotely; and (4) that the deposition only occur following the hearing on Defendant's just-filed  
4 Motion for Summary Judgment/Adjudication, set for October 7, 2025, nearly two months after the  
5 current trial date of August 18, 2025.

6 20. At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties  
7 further met and conferred, at an Informal Discovery Conference, or in any other venue.

8 21. Samantha Vincent – Mr. Diesel's sister – and Valentino Morales – Mr. Diesel's  
9 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
10 Los Angeles, California.

11 22. Plaintiff's counsel's office is located in the PwC building on 7<sup>th</sup> and Figueroa, which  
12 is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. Like many buildings downtown, it has  
13 multiple 24/7 dedicated security personnel. Entrance is restricted per floor, and visitors may only  
14 access a particular floor if they have been added to a security list and been ushered to an appropriate  
15 elevator by security.

16 23. I have been practicing law since 2015. I primarily litigate wrongful termination of  
17 employment and discrimination cases in both state and federal court on behalf of plaintiffs, including  
18 cases based upon violations of the Fair Employment and Housing Act and the California Labor  
19 Code.

20 24. I am a graduate of the University of California, Los Angeles, School of Law and of  
21 Harvard University.

22 25. In January of 2023, my colleagues and I tried Galvan v. United Parcel Service, et al.  
23 (LASC Case No. BC703891), which resulted in a \$5.4 million verdict.

24 26. I have been confirmed legal fees at an hourly rate of \$850.00 by Judge Lipner of  
25 Department 72.

26 27. Throughout my practice as an attorney on plaintiff's side, I have become familiar  
27 with customary billing rates for attorneys of my experience level and title. I understand that my  
28 hourly rate as an associate attorney of a plaintiff's law firm is at least comparable, if not below, the

1 hourly rates of other attorneys in similar situations.

2 28. I am familiar with the proper procedure for calculating hourly bills. I understand  
3 which tasks are billable and which are not. All of the time that I spent on this motion was necessary  
4 to prepare it properly and diligently.

5 29. I have primarily handled the discovery issues in this action. I have spent  
6 approximately one hour meeting and conferring with Defendant's counsel regarding the motion,  
7 including drafting and revising correspondence and participating in conferences regarding the  
8 same. I also spent more than 5 hours preparing and revising all briefing in connection with the  
9 instant Motion to Compel, including in preparing this declaration and preparing and revising the  
10 brief, notice, and proposed order (6 hours X \$850.00 = \$5,100.00). I anticipate that it will take me  
11 an additional 2.5 hours to review Defendant's opposition, prepare a reply brief in support of the  
12 motion, and prepare for and attend oral argument on this motion (2.5 hours X \$850.00 = \$2,125.00).  
13 I was also required to cancel my hotel reservation due to the cancellation of Defendant's deposition,  
14 with a fee in the amount of \$230.07. As such, Plaintiff has incurred fees and costs in the amount of  
15 \$5,330.07 and is likely to incur costs in the amount of \$2,125.00, for a total of \$7,455.07.

16 30. I gave notice of this *ex parte* application to defense counsel Sean Hardy via telephone  
17 around TIME a.m. on Wednesday, June 25, 2025. I then sent a confirming email soon afterward.  
18 Attached as Exhibit 14 is a true and correct copy of my June 25, 2025 email to Mr. Hardy. In the  
19 phone call and the email, I specifically stated that the hearing would take place at 8:30 a.m. on  
20 Thursday, June 26, 2025 in Department 71 of the Stanley Mosk Courthouse located at 111 North  
21 Hill Street, Los Angeles, California 90012.

22 I declare, under penalty of perjury under the laws of the State of California, that the foregoing  
23 is true and correct.

24 Date: June 25, 2025.

25 /s/ Matthew T. Hale

26 \_\_\_\_\_  
Matthew T. Hale

27

28

# **EXHIBIT 1**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
CLAIRE-LISE Y. KUTLAY, State Bar No. 307080  
*CKutlay@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT)**

Date: May 7, 2024  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: Not Yet Set


1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of Defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on May 7,  
6 2024, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 DATED: February 26, 2024

GREENBERG GROSS LLP

10  
11 By:



12 Brian L. Williams

13 Claire-Lise Y. Kutlay

14 Matthew T. Hale

15 Attorneys for Plaintiff Asta Jonasson  
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# **EXHIBIT 2**

FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
Tel: (310) 201-0005  
bfreedman@ftllp.com  
smhardy@ftllp.com  
jsunshine@ftllp.com

Attorneys for Defendant  
VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M. Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT)**

**Date: May 7, 2024**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the May 7, 2024 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310, that any deposition proceed via remote video, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets without the entry of a mutually-acceptable protective order.

5. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

6. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

1           7. Defendant objects to the Notice to the extent it fails to comply with the  
2 requirements on Code of Civil Procedure section 2025.210, *et seq.*

3  
4 DATED: May 1, 2024

FREEDMAN TAITELMAN + COOLEY, LLP

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6 

7 \_\_\_\_\_  
8 Bryan J. Freedman, Esq.  
9 Sean M. Hardy, Esq.  
10 Jason H. Sunshine, Esq.  
11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR  
13 VINCENT)  
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# **EXHIBIT 3**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT) AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS**

Date: April 29, 2025  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on April 29,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters



1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.



1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

22 ///

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28 ///

1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: April 7, 2025

GREENBERG GROSS LLP

5  
6 By: 

7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

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# **EXHIBIT 4**



**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

April 7, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

Enclosed please find notices of deposition for defendants Vin Diesel and Samantha Vincent and witnesses Valentino Morales and Thyrale Thai. If any of the noticed dates are not workable for the deponents' schedules, please let us know as soon as possible, and propose alternative dates that fall before the end of May 2025. Furthermore, counsel has previously objected that defendants Vin Diesel and Samantha Vincent *may* not reside within 150 miles of downtown Los Angeles. If these defendants do not reside within 150 miles of downtown Los Angeles, please notify our office of these defendants' city of residence, and we will coordinate a convenient location.

We are happy to accommodate reasonable scheduling conflicts, but considering the upcoming trial date, we will be completing these depositions by the end of May 2025.

Very truly yours,

Matthew T. Hale

Encls.

# **EXHIBIT 5**

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
2 Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
3 1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
4 Tel: (310) 201-0005  
bfreedman@lftcllp.com  
5 smhardy@lftcllp.com  
jsunshine@lftcllp.com

6 Attorneys for Defendant  
7 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10  
11 ASTA JONASSON, an individual,

12 Plaintiff,

13 vs.

14 VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
15 individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
16 FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,

17 Defendants.  
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28

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

**Date: April 29, 2025**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**



**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the April 29, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

5. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

6. Defendant objects to the Notice to the extent it fails to comply with the requirements on Code of Civil Procedure section 2025.210, *et seq.*

7. Defendant objects to the **14** requests for production of documents in connection with the Notice. Plaintiff served the requests for production of documents on April 7, 2025 by electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*, which contemplates 32 days when responding to document requests served by electronic service. See Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## II.

### **INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION**

The following responses are made solely for the purpose of this action. Any document or thing supplied in response to any request is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or thing, or portion thereof, if such document or thing were offered in evidence, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,

1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

7 **III.**

8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010. et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010. et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010. *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

#### IV.

#### **OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

##### **OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

1 Defendant objects to the request on the grounds that it seeks documents that are neither  
2 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Defendant objects to the request on the grounds that the request fails to designate the  
4 documents to be inspected either by specifically describing each individual item or by reasonably  
5 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
6 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
7 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

8 Defendant objects to the request on the grounds that to comply with the request would be  
9 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
10 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
11 Defendant.

12 Defendant objects to this request on the grounds it requests Defendant to search  
13 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
14 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
15 the ESI.

16 Defendant objects to this request on the grounds it seeks information of Defendant and third  
17 parties that is protected by the right to privacy.

18 Defendant objects to the request on the grounds that it is overly broad and unduly  
19 burdensome.

20 Defendant objects to the request on the grounds that it is vague, ambiguous and  
21 unintelligible.

22 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
23 other discovery propounded by Plaintiff to Defendant in this litigation.

24 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
25 to Defendant's financial condition in violation of California Civil Code § 3295.

26 Defendant objects to the request on the ground that it improperly seeks discovery relating  
27 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
28 Cal.App.4th 475, 480-481.



Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search



1 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
2 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
3 the ESI.

4 Defendant objects to this request on the grounds it seeks information of Defendant and third  
5 parties that is protected by the right to privacy.

6 Defendant objects to the request on the grounds that it is overly broad and unduly  
7 burdensome.

8 Defendant objects to the request on the grounds that it is vague, ambiguous and  
9 unintelligible.

10 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
11 other discovery propounded by Plaintiff to Defendant in this litigation.

12 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
13 to Defendant’s financial condition in violation of California Civil Code § 3295.

14 Defendant objects to the request on the ground that it improperly seeks discovery relating  
15 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
16 Cal.App.4th 475, 480-481.

17 Defendant objects to the request to the extent it seeks the production of records protected  
18 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
19 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

20 **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

21 Defendant incorporates the Preliminary Statement and General Objections as though fully  
22 set forth herein.

23 Defendant objects to the request on the grounds that it seeks documents from a remote time  
24 period.

25 Defendant objects to the request on the grounds that it seeks documents and  
26 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
27 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

28 Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential information protected by the right to privacy under the California or United States  
2 Constitution or applicable statutory or common law.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential business or proprietary information protected by trade secret.

5 Defendant objects to the request on the grounds that it seeks documents that are neither  
6 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

7 Defendant objects to the request on the grounds that the request fails to designate the  
8 documents to be inspected either by specifically describing each individual item or by reasonably  
9 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

10 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
11 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

12 Defendant objects to the request on the grounds that to comply with the request would be  
13 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
14 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
15 Defendant.

16 Defendant objects to this request on the grounds it requests Defendant to search  
17 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
18 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
19 the ESI.

20 Defendant objects to this request on the grounds it seek information of Defendant and third  
21 parties that is protected by the right to privacy.

22 Defendant objects to the request on the grounds that it is overly broad and unduly  
23 burdensome.

24 Defendant objects to the request on the grounds that it is vague, ambiguous and  
25 unintelligible.

26 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
27 other discovery propounded by Plaintiff to Defendant in this litigation.

28 Defendant objects to the request on the grounds that it improperly seeks discovery relating

1 to Defendant's financial condition in violation of California Civil Code § 3295.

2 Defendant objects to the request on the ground that it improperly seeks discovery relating  
3 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
4 Cal.App.4th 475, 480-481.

5 Defendant objects to the request to the extent it seeks the production of records protected  
6 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
7 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

8 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

9 Defendant incorporates the Preliminary Statement and General Objections as though fully  
10 set forth herein.

11 Defendant objects to the request on the grounds that it seeks documents from a remote time  
12 period.

13 Defendant objects to the request on the grounds that it seeks documents and  
14 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
15 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential information protected by the right to privacy under the California or United States  
18 Constitution or applicable statutory or common law.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential business or proprietary information protected by trade secret.

21 Defendant objects to the request on the grounds that it seeks documents that are neither  
22 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

23 Defendant objects to the request on the grounds that the request fails to designate the  
24 documents to be inspected either by specifically describing each individual item or by reasonably  
25 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
26 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
27 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

28 Defendant objects to the request on the grounds that to comply with the request would be

1 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
2 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
3 Defendant.

4 Defendant objects to this request on the grounds it requests Defendant to search  
5 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
6 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
7 the ESI.

8 Defendant objects to this request on the grounds it seeks information of Defendant and third  
9 parties that is protected by the right to privacy.

10 Defendant objects to the request on the grounds that it is overly broad and unduly  
11 burdensome.

12 Defendant objects to the request on the grounds that it is vague, ambiguous and  
13 unintelligible.

14 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
15 other discovery propounded by Plaintiff to Defendant in this litigation.

16 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
17 to Defendant’s financial condition in violation of California Civil Code § 3295.

18 Defendant objects to the request on the ground that it improperly seeks discovery relating  
19 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
20 Cal.App.4th 475, 480-481.

21 Defendant objects to the request to the extent it seeks the production of records protected  
22 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
23 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

24 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
28 period.

1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
23 the ESI.

24 Defendant objects to this request on the grounds it seeks information of Defendant and third  
25 parties that is protected by the right to privacy.

26 Defendant objects to the request on the grounds that it is overly broad and unduly  
27 burdensome.

28 Defendant objects to the request on the grounds that it is vague, ambiguous and

1 unintelligible.

2 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
3 other discovery propounded by Plaintiff to Defendant in this litigation.

4 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
5 to Defendant's financial condition in violation of California Civil Code § 3295.

6 Defendant objects to the request on the ground that it improperly seeks discovery relating  
7 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
8 Cal.App.4th 475, 480-481.

9 Defendant objects to the request to the extent it seeks the production of records protected  
10 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
11 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

12 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

13 Defendant incorporates the Preliminary Statement and General Objections as though fully  
14 set forth herein.

15 Defendant objects to the request on the grounds that it seeks documents from a remote time  
16 period.

17 Defendant objects to the request on the grounds that it seeks documents and  
18 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
19 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential information protected by the right to privacy under the California or United States  
22 Constitution or applicable statutory or common law.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential business or proprietary information protected by trade secret.

25 Defendant objects to the request on the grounds that it seeks documents that are neither  
26 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

27 Defendant objects to the request on the grounds that the request fails to designate the  
28 documents to be inspected either by specifically describing each individual item or by reasonably

1 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
2 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
3 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

4 Defendant objects to the request on the grounds that to comply with the request would be  
5 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
6 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
7 Defendant.

8 Defendant objects to this request on the grounds it requests Defendant to search  
9 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
10 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
11 the ESI.

12 Defendant objects to this request on the grounds it seeks information of Defendant and third  
13 parties that is protected by the right to privacy.

14 Defendant objects to the request on the grounds that it is overly broad and unduly  
15 burdensome.

16 Defendant objects to the request on the grounds that it is vague, ambiguous and  
17 unintelligible.

18 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
19 other discovery propounded by Plaintiff to Defendant in this litigation.

20 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
21 to Defendant’s financial condition in violation of California Civil Code § 3295.

22 Defendant objects to the request on the ground that it improperly seeks discovery relating  
23 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
24 Cal.App.4th 475, 480-481.

25 Defendant objects to the request to the extent it seeks the production of records protected  
26 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
27 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.



**OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.



1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

3 Defendant objects to the request on the grounds that it is overly broad and unduly  
4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

18 Defendant incorporates the Preliminary Statement and General Objections as though fully  
19 set forth herein.

20 Defendant objects to the request on the grounds that it seeks documents from a remote time  
21 period.

22 Defendant objects to the request on the grounds that it seeks documents and  
23 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
24 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

25 Defendant objects to the request on the grounds that it seeks documents that contain  
26 confidential information protected by the right to privacy under the California or United States  
27 Constitution or applicable statutory or common law.

28 Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential business or proprietary information protected by trade secret.

2 Defendant objects to the request on the grounds that it seeks documents that are neither  
3 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 Defendant objects to the request on the grounds that the request fails to designate the  
5 documents to be inspected either by specifically describing each individual item or by reasonably  
6 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

7 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
8 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

9 Defendant objects to the request on the grounds that to comply with the request would be  
10 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
11 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
12 Defendant.

13 Defendant objects to this request on the grounds it requests Defendant to search  
14 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
15 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
16 the ESI.

17 Defendant objects to this request on the grounds it seek information of Defendant and third  
18 parties that is protected by the right to privacy.

19 Defendant objects to the request on the grounds that it is overly broad and unduly  
20 burdensome.

21 Defendant objects to the request on the grounds that it is vague, ambiguous and  
22 unintelligible.

23 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
24 other discovery propounded by Plaintiff to Defendant in this litigation.

25 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
26 to Defendant’s financial condition in violation of California Civil Code § 3295.

27 Defendant objects to the request on the ground that it improperly seeks discovery relating  
28 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114

1 Cal.App.4th 475, 480-481.

2 Defendant objects to the request to the extent it seeks the production of records protected  
3 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
4 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

5 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

6 Defendant incorporates the Preliminary Statement and General Objections as though fully  
7 set forth herein.

8 Defendant objects to the request on the grounds that it seeks documents from a remote time  
9 period.

10 Defendant objects to the request on the grounds that it seeks documents and  
11 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
12 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

13 Defendant objects to the request on the grounds that it seeks documents that contain  
14 confidential information protected by the right to privacy under the California or United States  
15 Constitution or applicable statutory or common law.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential business or proprietary information protected by trade secret.

18 Defendant objects to the request on the grounds that it seeks documents that are neither  
19 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Defendant objects to the request on the grounds that the request fails to designate the  
21 documents to be inspected either by specifically describing each individual item or by reasonably  
22 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
23 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
24 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

25 Defendant objects to the request on the grounds that to comply with the request would be  
26 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
27 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
28 Defendant.

1 Defendant objects to this request on the grounds it requests Defendant to search  
2 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
3 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
4 the ESI.

5 Defendant objects to this request on the grounds it seeks information of Defendant and third  
6 parties that is protected by the right to privacy.

7 Defendant objects to the request on the grounds that it is overly broad and unduly  
8 burdensome.

9 Defendant objects to the request on the grounds that it is vague, ambiguous and  
10 unintelligible.

11 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
12 other discovery propounded by Plaintiff to Defendant in this litigation.

13 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
14 to Defendant’s financial condition in violation of California Civil Code § 3295.

15 Defendant objects to the request on the ground that it improperly seeks discovery relating  
16 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
17 Cal.App.4th 475, 480-481.

18 Defendant objects to the request to the extent it seeks the production of records protected  
19 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
20 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

21 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

22 Defendant incorporates the Preliminary Statement and General Objections as though fully  
23 set forth herein.

24 Defendant objects to the request on the grounds that it seeks documents from a remote time  
25 period.

26 Defendant objects to the request on the grounds that it seeks documents and  
27 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
28 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

1 Defendant objects to the request on the grounds that it seeks documents that contain  
2 confidential information protected by the right to privacy under the California or United States  
3 Constitution or applicable statutory or common law.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential business or proprietary information protected by trade secret.

6 Defendant objects to the request on the grounds that it seeks documents that are neither  
7 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

8 Defendant objects to the request on the grounds that the request fails to designate the  
9 documents to be inspected either by specifically describing each individual item or by reasonably  
10 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
11 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
12 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

13 Defendant objects to the request on the grounds that to comply with the request would be  
14 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
15 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
16 Defendant.

17 Defendant objects to this request on the grounds it requests Defendant to search  
18 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
19 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
20 the ESI.

21 Defendant objects to this request on the grounds it seeks information of Defendant and third  
22 parties that is protected by the right to privacy.

23 Defendant objects to the request on the grounds that it is overly broad and unduly  
24 burdensome.

25 Defendant objects to the request on the grounds that it is vague, ambiguous and  
26 unintelligible.

27 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
28 other discovery propounded by Plaintiff to Defendant in this litigation.

1 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
2 to Defendant's financial condition in violation of California Civil Code § 3295.

3 Defendant objects to the request on the ground that it improperly seeks discovery relating  
4 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
5 Cal.App.4th 475, 480-481.

6 Defendant objects to the request to the extent it seeks the production of records protected  
7 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
8 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

9 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

10 Defendant incorporates the Preliminary Statement and General Objections as though fully  
11 set forth herein.

12 Defendant objects to the request on the grounds that it seeks documents from a remote time  
13 period.

14 Defendant objects to the request on the grounds that it seeks documents and  
15 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
16 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

17 Defendant objects to the request on the grounds that it seeks documents that contain  
18 confidential information protected by the right to privacy under the California or United States  
19 Constitution or applicable statutory or common law.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential business or proprietary information protected by trade secret.

22 Defendant objects to the request on the grounds that it seeks documents that are neither  
23 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 Defendant objects to the request on the grounds that the request fails to designate the  
25 documents to be inspected either by specifically describing each individual item or by reasonably  
26 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
27 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
28 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

1 Defendant objects to the request on the grounds that to comply with the request would be  
 2 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 3 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 4 Defendant.

5 Defendant objects to this request on the grounds it requests Defendant to search  
 6 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
 7 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
 8 the ESI.

9 Defendant objects to this request on the grounds it seek information of Defendant and third  
 10 parties that is protected by the right to privacy.

11 Defendant objects to the request on the grounds that it is overly broad and unduly  
 12 burdensome.

13 Defendant objects to the request on the grounds that it is vague, ambiguous and  
 14 unintelligible.

15 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
 16 other discovery propounded by Plaintiff to Defendant in this litigation.

17 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
 18 to Defendant’s financial condition in violation of California Civil Code § 3295.

19 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 20 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 21 Cal.App.4th 475, 480-481.

22 Defendant objects to the request to the extent it seeks the production of records protected  
 23 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 24 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 28 period.



1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
the ESI.

23 Defendant objects to this request on the grounds it seeks information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.



1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

1 Defendant objects to the request on the grounds that it seeks documents from a remote time  
2 period.

3 Defendant objects to the request on the grounds that it seeks documents and  
4 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
5 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential information protected by the right to privacy under the California or United States  
8 Constitution or applicable statutory or common law.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential business or proprietary information protected by trade secret.

11 Defendant objects to the request on the grounds that it seeks documents that are neither  
12 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

13 Defendant objects to the request on the grounds that the request fails to designate the  
14 documents to be inspected either by specifically describing each individual item or by reasonably  
15 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
16 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
17 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

18 Defendant objects to the request on the grounds that to comply with the request would be  
19 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
20 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
21 Defendant.

22 Defendant objects to this request on the grounds it requests Defendant to search  
23 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
24 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
the ESI.

25 Defendant objects to this request on the grounds it seek information of Defendant and third  
26 parties that is protected by the right to privacy.

27 Defendant objects to the request on the grounds that it is overly broad and unduly  
28 burdensome.

1 Defendant objects to the request on the grounds that it is vague, ambiguous and  
2 unintelligible.

3 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
4 other discovery propounded by Plaintiff to Defendant in this litigation.


5 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
6 to Defendant's financial condition in violation of California Civil Code § 3295.

7 Defendant objects to the request on the ground that it improperly seeks discovery relating  
8 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
9 Cal.App.4th 475, 480-481.

10 Defendant objects to the request to the extent it seeks the production of records protected  
11 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
12 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

13  
14 DATED: April 24, 2025

LINER FREEDMAN TAITELMAN + COOLEY, LLP

15  
16   
17 Bryan J. Freedman, Esq.  
18 Sean M. Hardy, Esq.  
19 Jason H. Sunshine, Esq.  
20 Attorneys for Defendant  
21 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

1  
2 **STATE OF CALIFORNIA** |  
3 **COUNTY OF LOS ANGELES** | ss.  
4

5 I am employed in the County of Los Angeles, State of California. I am over the age of  
6 18 and not a party to the within action; my business address is 1801 Century Park West, 5<sup>th</sup> Floor,  
7 Los Angeles, California 90067.

8 On **April 24, 2025**, I served the foregoing document(s) entitled **OBJECTIONS TO  
9 NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR  
10 VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested  
11 parties in this action as follows:

12 Brian L. Williams 13 Claire-Lise Y. Kutlay 14 Matthew T. Hale 15 Philip A. Horlacher 16 Kathie Lee 17 Crystal M. Rose 18 Maria Sance 19 GREENBERG GROSS LLP 20 601 S. Figueroa Street, 30 <sup>th</sup> Floor 21 Los Angeles, California 90017 22 Tel. (213) 334-7000 23 Fax. (213) 334-7001 24 25 <i>Attorneys for Plaintiff Asta Jonasson</i>	<a href="mailto:BWilliams@GGTrialLaw.com">BWilliams@GGTrialLaw.com</a> <a href="mailto:CKutlay@GGTrialLaw.com">CKutlay@GGTrialLaw.com</a> <a href="mailto:MHale@GGTrialLaw.com">MHale@GGTrialLaw.com</a> <a href="mailto:PHorlacher@GGTrialLaw.com">PHorlacher@GGTrialLaw.com</a> <a href="mailto:KLee@GGTrialLaw.com">KLee@GGTrialLaw.com</a> <a href="mailto:CRose@GGTrialLaw.com">CRose@GGTrialLaw.com</a> <a href="mailto:MSance@GGTrialLaw.com">MSance@GGTrialLaw.com</a>
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26 ☒ **By Overnight Mail:** by placing the document(s) listed above in a sealed Federal Express  
27 envelope and affixing a pre-paid air bill and causing the envelope to be delivered to a Federal  
28 Express agent for next business day delivery to the address(es) listed below.

I declare under penalty of perjury under the laws of the State of California that the above is  
true and correct. Executed on **April 24, 2025**, at Los Angeles, California.

/s/ Vaneta D. BIRTHA  
Vaneta D. BIRTHA

# **EXHIBIT 6**



**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

May 1, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

I write to meet and confer regarding Vin Diesel's general objections to Plaintiff's deposition subpoena.

First, Mr. Diesel's objection based on scheduling is not well-taken. Plaintiff is not required to "clear dates" before noticing a deposition. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure sections 2025.210 and 2020.220. Plaintiff already initiated a good faith effort to coordinate the deposition, and your office failed to respond in any way until making the instant objection.

Second, Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."

Third, Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. My April 7, 2025 letter even inquired about this previously stated objection, but Mr. Diesel chose to reuse this equivocal objection nonetheless.





**Greenberg Gross LLP**

May 1, 2025

Page 2

Fourth, Ms. Jonasson's deposition has not been noticed for any future date, no less in the "reasonably near future," as required by the related LASC Local Rule. Defendant has chosen to not re-notice Plaintiff's deposition since early 2024.

Fifth, there is no seven hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.

Sixth, the objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.

Seventh, this objection does not relate to Mr. Diesel sitting for his deposition but rather to the documents demanded in the notice. This dispute will be addressed elsewhere.

Eighth, the objection merely asserts good cause exists to stay the deposition pending the MJOP. The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal* and *Silver* are both cases where a plaintiff has yet to get past the pleadings stage and the court stated that the plaintiff had to state at least one cause of action before discovery or deposition would be permitted. Of course, this matter is past the pleadings stage, and the MJOP does not even relate to each and every cause of action. Furthermore, the Defendants would need to file a Motion to Stay Discovery in order to stay fact discovery, and they have not done so.

Please let us know when you are available for a call on these topics tomorrow or early next week. Thereafter, we will need to seek relief from the Court.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Matthew T. Hale'.

Matthew T. Hale



# **EXHIBIT 7**

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**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, May 9, 2025 5:18 PM  
**To:** Matthew T. Hale  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** [EXT] RE: Jonasson v. Diesel, et al.

Matt:

Further to our meet and confer discussion on Monday, we can confirm that Samantha Vincent is available for deposition on May 29. Non-party Valentino Morales is available for deposition on June 3. Vin Diesel is available in-person on June 24 and June 25. Please confirm those dates, so we can lock them in. We are in the process of obtaining availability from non-party Thyrale Thai and should be in a position to offer the same to you next week. Additionally, per our prior request and discussion, please provide Ms. Jonasson's availability for deposition during this period. Finally, per our prior proposal and discussion on Monday, we reiterate that we have confirmed that Department 71 accepts stipulations and proposed orders to continue trial dates, and that we are amenable to doing so given your protestations regarding timing constraints.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
Cell: (917) 841-8716  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [fllp.com](http://fllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

# **EXHIBIT 8**

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**From:** Matthew T. Hale  
**Sent:** Tuesday, May 13, 2025 10:12 AM  
**To:** Jason Sunshine  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** RE: Jonasson v. Diesel, et al.

Hi Jason,

Yes, I'll presume the in-person location is Los Angeles, but please let us know immediately if this is not correct. In the interim, we'll notice them for our LA office. I can confirm the dates for Valentino Morales (6/3) and Vin Diesel (6/24-25). We will notice these depositions shortly.

We will need additional dates for Samantha Vincent's deposition as 5/29 does not work for us. Please provide those and dates for Ms. Thai as soon as possible. Thank you.

We are not amenable to continuing the trial.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)



Los Angeles | Orange County | Las Vegas | New York

# **EXHIBIT 9**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**AMENDED NOTICE OF DEPOSITION  
TO DEFENDANT VIN DIESEL (F/K/A  
MARK SINCLAIR VINCENT) AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Date: June 24-25, 2025

Time: 9:00 a.m.

Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023

Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on June 24-25,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters

1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.



7. The conjunctive “and” should be interpreted in the disjunctive to include the term “or” and vice versa.

8. The singular form of a word should be interpreted in the plural and vice versa.

9. If YOUR response to any Request is that the DOCUMENTS are not in YOUR possession, custody, or control, describe in detail the efforts YOU made to locate such DOCUMENTS.

10. If any responsive DOCUMENT was at one time in YOUR possession, custody, or control, but has been disposed of, lost, discarded, destroyed, or is no longer in YOUR possession, custody, or control for any other reason, then do the following with respect to each and every such DOCUMENT:

a. describe the nature of the DOCUMENT, letter or memorandum;

b. state the date of the DOCUMENT;

c. identify the PERSONS who sent and received the original and copies of the DOCUMENT, specifying its author, addressee, and all PERSONS to whom copies were furnished, or saw same;

d. state in as much detail as possible the subject matter and contents of the DOCUMENT; and

e. state when the DOCUMENT was in YOUR possession, custody, or control.

If objection is made to any part of a particular Request, that part should be specified in writing (together with the grounds for the objection), and any other portion of the Request to which no objection is made should be answered.

## REQUESTS FOR PRODUCTION

### REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS maintained by YOU that contain the name of plaintiff Asta Jonasson.

### REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS relating to plaintiff Asta Jonasson.

### REQUEST FOR PRODUCTION NO. 3:

All emails referring to plaintiff Asta Jonasson.

1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

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1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: May 13, 2025

GREENBERG GROSS LLP

5  
6 By: 

7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

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**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On May 13, 2025, I served true copies of the following document(s) described as **AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.  
Sean M. Hardy, Esq.  
Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Emails: bfreedman@lftcllp.com;  
smhardy@lftcllp.com;  
jsunshine@lftcllp.com;  
vbirtha@lftcllp.com;  
cpuello@lftcllp.com;

Attorneys for Defendants Once Race Films, Inc.,  
One Race Production, Inc., Vin Diesel f/k/a Mark  
Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 13, 2025, at Los Angeles, California.



Hazelle T Nunez

# **EXHIBIT 10**

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
2 Bryan J. Freedman, Esq. (SBN 151990)  
3 Sean M. Hardy, Esq. (SBN 266466)  
4 Jason Sunshine (SBN 336062)  
5 1801 Century Park East, 5th Floor  
6 Los Angeles, CA 90067  
7 Tel: (310) 201-0005  
8 bfreedman@lftcllp.com  
9 smhardy@lftcllp.com  
10 jsunshine@lftcllp.com

11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,  
Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,  
Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO AMENDED NOTICE  
OF DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

Date: June 24-25, 2025

Time: 9:00 a.m.

Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s amended notice of the June 24 to June 25, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The Defendant is no longer available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed. The Notice improperly calls for Defendant’s deposition on two consecutive dates. The burden on Defendant of an endless deposition outweighs the needs of the case.

5. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets. Defendant objects into any inquiry into matters protected by Defendant’s right to privacy, including without limitation Defendant’s sexual history and financial condition. Defendant is entitled to a protective order pursuant to Code of Civil Procedure Section 2025.420 and Civil Code Section 3295 to prevent inquiry into improper subject matter and topics.

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,



1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

7 **III.**

8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010, et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010, et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information ("ESI") without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010, *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

**IV.**

**OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither

1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seeks information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected

1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
12 confidential information protected by the right to privacy under the California or United States  
13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
19 documents to be inspected either by specifically describing each individual item or by reasonably  
20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
28 electronically-stored information ("ESI") without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States



1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
18 the ESI.

19 Defendant objects to this request on the grounds it seek information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant's financial condition in violation of California Civil Code § 3295.



1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
 5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
 13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
 16 confidential information protected by the right to privacy under the California or United States  
 17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
 19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
 21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
 23 documents to be inspected either by specifically describing each individual item or by reasonably  
 24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
 28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*

1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and

1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.

1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully

1 set forth herein.

2 Defendant objects to the request on the grounds that it seeks documents from a remote time  
3 period.

4 Defendant objects to the request on the grounds that it seeks documents and  
5 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
6 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential information protected by the right to privacy under the California or United States  
9 Constitution or applicable statutory or common law.

10 Defendant objects to the request on the grounds that it seeks documents that contain  
11 confidential business or proprietary information protected by trade secret.

12 Defendant objects to the request on the grounds that it seeks documents that are neither  
13 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

14 Defendant objects to the request on the grounds that the request fails to designate the  
15 documents to be inspected either by specifically describing each individual item or by reasonably  
16 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
17 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
18 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

19 Defendant objects to the request on the grounds that to comply with the request would be  
20 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
21 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
22 Defendant.

23 Defendant objects to this request on the grounds it requests Defendant to search  
24 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
25 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
26 the ESI.

27 Defendant objects to this request on the grounds it seek information of Defendant and third  
28 parties that is protected by the right to privacy.

1 Defendant objects to the request on the grounds that it is overly broad and unduly  
2 burdensome.

3 Defendant objects to the request on the grounds that it is vague, ambiguous and  
4 unintelligible.

5 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
6 other discovery propounded by Plaintiff to Defendant in this litigation.

7 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
8 to Defendant's financial condition in violation of California Civil Code § 3295.

9 Defendant objects to the request on the ground that it improperly seeks discovery relating  
10 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
11 Cal.App.4th 475, 480-481.

12 Defendant objects to the request to the extent it seeks the production of records protected  
13 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
14 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

15 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

16 Defendant incorporates the Preliminary Statement and General Objections as though fully  
17 set forth herein.

18 Defendant objects to the request on the grounds that it seeks documents from a remote time  
19 period.

20 Defendant objects to the request on the grounds that it seeks documents and  
21 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
22 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential information protected by the right to privacy under the California or United States  
25 Constitution or applicable statutory or common law.

26 Defendant objects to the request on the grounds that it seeks documents that contain  
27 confidential business or proprietary information protected by trade secret.

28 Defendant objects to the request on the grounds that it seeks documents that are neither



1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seek information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected



1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
 9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
 12 confidential information protected by the right to privacy under the California or United States  
 13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
 15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
 17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
 19 documents to be inspected either by specifically describing each individual item or by reasonably  
 20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
 24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
 28 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States

1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
18 the ESI.

19 Defendant objects to this request on the grounds it seeks information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant’s financial condition in violation of California Civil Code § 3295.

1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
 5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
 13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
 16 confidential information protected by the right to privacy under the California or United States  
 17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
 19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
 21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
 23 documents to be inspected either by specifically describing each individual item or by reasonably  
 24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
 28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*

1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and

1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.



1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

1 (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also  
2 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

3 Defendant objects to the request on the grounds that to comply with the request would be  
4 an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court*  
5 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
6 Defendant.

7 Defendant objects to this request on the grounds it requests Defendant to search  
8 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
9 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
10 the ESI.

11 Defendant objects to this request on the grounds it seek information of Defendant and third  
12 parties that is protected by the right to privacy.

13 Defendant objects to the request on the grounds that it is overly broad and unduly  
14 burdensome.

15 Defendant objects to the request on the grounds that it is vague, ambiguous and  
16 unintelligible.

17 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
18 other discovery propounded by Plaintiff to Defendant in this litigation.

19 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
20 to Defendant’s financial condition in violation of California Civil Code § 3295.

21 Defendant objects to the request on the ground that it improperly seeks discovery relating  
22 to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114  
23 Cal.App.4th 475, 480-481.

24 Defendant objects to the request to the extent it seeks the production of records protected  
25 by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also  
26 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

27 ///

28 ///



1 **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

2 Defendant incorporates the Preliminary Statement and General Objections as though fully  
3 set forth herein.

4 Defendant objects to the request on the grounds that it seeks documents from a remote time  
5 period.

6 Defendant objects to the request on the grounds that it seeks documents and  
7 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
8 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential information protected by the right to privacy under the California or United States  
11 Constitution or applicable statutory or common law.

12 Defendant objects to the request on the grounds that it seeks documents that contain  
13 confidential business or proprietary information protected by trade secret.

14 Defendant objects to the request on the grounds that it seeks documents that are neither  
15 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 Defendant objects to the request on the grounds that the request fails to designate the  
17 documents to be inspected either by specifically describing each individual item or by reasonably  
18 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
19 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
20 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

21 Defendant objects to the request on the grounds that to comply with the request would be  
22 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
23 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
24 Defendant.

25 Defendant objects to this request on the grounds it requests Defendant to search  
26 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
27 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
28 the ESI.

1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

3 Defendant objects to the request on the grounds that it is overly broad and unduly  
4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17  
18 DATED: June 20, 2025

LINER FREEDMAN TAITELMAN + COOLEY,  
LLP

19  
20 

21 By: \_\_\_\_\_  
22 Bryan J. Freedman, Esq.  
23 Sean M. Hardy, Esq.  
24 Jason H. Sunshine, Esq.  
25 Attorneys for Defendant  
26 VIN DIESEL (F/K/A MARK SINCLAIR  
27 VINCENT)  
28

**PROOF OF SERVICE**

**STATE OF CALIFORNIA** |  
| ss.  
**COUNTY OF LOS ANGELES** |

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business is EXPRESS NETWORK, LLC, 1605 W. Olympic Blvd, Suite 800, Los Angeles, CA 90015.

On June 20, 2025, I served the foregoing document(s) described:

**OBJECTIONS TO AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017  
*Attorneys for Plaintiff Asta Jonasson*

☒ **By Personal Service.** I personally delivered the above listed documents to the persons at the addresses listed above.

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

Daniel Chavel  
Print Name (Messenger)

[Signature]  
Signature of Declarant (Messenger)

**STATE OF CALIFORNIA**                 ]  
  ]ss.  
**COUNTY OF LOS ANGELES**         ]

On June 20, 2025, I served the foregoing document(s) described:

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof  
enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross, LLP  
650 Town Center Dr, Ste 1700  
Costa Mesa, CA 92626-7025  
*Attorneys for Plaintiff Asta Jonasson*

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

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Print Name (Messenger)

Signature of Declarant (Messenger)

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# **EXHIBIT 11**



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**From:** Matthew T. Hale  
**Sent:** Friday, June 20, 2025 5:12 PM  
**To:** Bryan Freedman; Sean M. Hardy; Jason Sunshine  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha  
**Subject:** Jonasson v. Vin Diesel, et al

Counsel:

We are in receipt of defendant Vin Diesel's objections to Plaintiff's Amended Notice of Deposition and Requests for Production of Documents. For the first time since these dates (June 24 and 25) were provided by his counsel on May 9, 2025, and despite his agreement to appear in Los Angeles, Defendant Vin Diesel now suddenly asserts that he is not available to attend his duly noticed deposition. Please provide, by end of day this coming Monday June 23, 2025, multiple alternative dates for his deposition that fall on or before July 18th. Given the apparent gamesmanship and bad faith nature of this objection, if we do not receive these multiple dates by Monday, we will move forward with a Motion to Compel Vin Diesel's deposition and will take a notice of non-appearance on Tuesday. As to the remainder of Defendant's objections, please see the below:

2. Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."
3. Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. Furthermore, Samantha Vincent already confirmed that Mr. Diesel currently lives in Los Angeles.
4. There is no seven-hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.
5. Defendant asserts that he shouldn't have to attend his deposition because questions *may* be asked that implicate his privacy. Not only is this not a ground to forego attendance altogether, but also there is a protective order in this matter in place to protect truly confidential portions of the deposition.
6. There is absolutely no indication that Plaintiff's office, which has ample security staff and precautions, is inadequate to protect Mr. Diesel's personal safety and privacy.
7. The objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.
8. The objection incorrectly asserts that there is a dispositive motion pending.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)





# **EXHIBIT 12**

---

**From:** Sean M. Hardy <smhardy@lftcllp.com>  
**Sent:** Monday, June 23, 2025 8:09 AM  
**To:** Matthew T. Hale  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha; Bryan Freedman; Jason Sunshine  
**Subject:** [EXT] RE: Jonasson v. Vin Diesel, et al

Counsel,

We respectfully disagree with your position below, and will meet and confer with you on this issue in person today at your office. Thank you.

Sincerely,

Sean M. Hardy

Sean M. Hardy, Esq.  
Partner  
LINER FREEDMAN TAITELMAN + COOLEY, LLP  
1801 Century Park West, 5th Floor  
Los Angeles, California 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Web: [www.ftllp.com](http://www.ftllp.com)

---

# **EXHIBIT 13**

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S  
MOTION TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND REQUEST FOR  
SANCTIONS; MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT THEREOF**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion to Compel; Declaration of Matthew T. Hale; [Proposed] Order]*

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

This case arises from allegations that Defendant Vin Diesel sexually assaulted Plaintiff Asta Jonasson in September 2010 while she was working as his assistant during the production of the film “Fast Five,” and then terminated her employment the following day in retaliation for resisting the assault incident. Plaintiff remained silent for years due to fear of industry ostracization, immigration concerns as a green card holder, and restrictive non-disclosure agreements imposed by Defendants. Empowered by recent legislative changes, Plaintiff filed this lawsuit in December 2023 seeking redress for the sexual assault and wrongful termination.

Plaintiff now moves to compel Defendant Vin Diesel’s deposition after a pattern of evasion and obstruction spanning over a year. Despite multiple notices, good faith efforts to accommodate his schedule, and his counsel’s express confirmation of availability for June 24-25, 2025, Defendant served last-minute objections containing recycled, meritless arguments just four days before his scheduled deposition. When Plaintiff’s counsel attempted to meet and confer, Defendant’s counsel responded with shocking misconduct, including profanity, threats of malicious prosecution, and physical intimidation, while refusing to provide any legitimate explanation for Defendant’s sudden unavailability. Defendant’s objections lack merit as they misinterpret applicable statutes, seek to prevent discovery on topics central to Plaintiff’s claims, and attempt to delay proceedings until after trial through frivolous procedural maneuvers.

Plaintiff respectfully requests this Court compel Defendant Vin Diesel to appear for deposition within ten days and impose monetary sanctions of \$7,455.07 against Defendant and his counsel for their willful abuse of the discovery process, pattern of evasion, and unmeritorious objections that have unnecessarily delayed essential discovery in this matter.

**II. STATEMENT OF THE CASE**

**A. Defendant Vin Diesel’s Testimony is Essential to the Prosecution of Plaintiff’s Matter.**

In September 2010, Plaintiff Asta Jonasson was hired by Defendants as an assistant working directly for Defendant Vin Diesel during the production of “Fast Five.” (Compl., p. 2, ¶ 1.) Shortly



1 after beginning her employment, on or about September 10, 2010, Plaintiff alleges that Defendant  
 2 Diesel sexually assaulted her in his hotel suite at the St. Regis Hotel in Atlanta, Georgia. (Compl.,  
 3 p. 10, ¶¶ 29-30.) The following day, on or about September 11, 2010, Plaintiff was terminated from  
 4 her position when Samantha Vincent, President of One Race and Defendant Diesel’s sister, called  
 5 Plaintiff and stated that One Race no longer needed “any extra help.” (Compl., p. 11, ¶ 32.)

6 For years following the alleged incident, Plaintiff remained silent about the sexual assault.  
 7 She was afraid to speak out against a high-profile actor due to concerns about being ostracized from  
 8 the industry jeopardizing her potential future citizenship while she was a green card holder. (Compl.,  
 9 p. 3, ¶ 7.) Additionally, One Race required all employees to sign non-disclosure agreements, further  
 10 limiting Plaintiff’s ability to discuss matters related to her employment and Defendant Diesel.  
 11 (Compl., p. 3, ¶ 7.)

12 Recently empowered by the #MeToo and Time’s Up movements, and with the protection of  
 13 the Speak Out Act and the revival of her claims under California Assembly Bill 2777 (AB 2777),  
 14 Plaintiff is now seeking legal relief for the alleged sexual assault and subsequent termination of her  
 15 employment. (Compl., p. 4, ¶ 7.)

16 This lawsuit was filed on December 21, 2023, pursuant to Code of Civil Procedure § 340.16,  
 17 as amended by Assembly Bill 2777.

18 **B. Defendant Vin Diesel Has Repeatedly Evaded Deposition Despite Multiple**  
 19 **Notices and Good Faith Efforts To Accommodate His Schedule.**

20 Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024.  
 21 (See Declaration of Matthew T. Hale (“Hale Decl.”), ¶ 2, Exh. 1.) On May 1, 2024, Defendant  
 22 served his objection to the notice of deposition, indicating in part that neither he nor his counsel  
 23 were available on that date. (Hale Decl., ¶ 3, Exh. 2.)

24 On April 7, 2025, Plaintiff re-noticed Mr. Diesel’s deposition for April 29, 2025. (Hale Decl.,  
 25 ¶ 4, Exh. 3.) and requested that Defendant’s counsel provide alternative deposition dates if Mr.  
 26 Diesel or his attorneys were not available on that date. (Hale Decl., ¶¶ 4-5, Exhs. 3-4.) More than  
 27 two weeks later, on April 24, 2025, Defendant’s counsel belatedly responded by serving objections  
 28 to the deposition notice via overnight mail without providing any alternative deposition dates. (Hale

Decl., ¶ 6, Exh. 5.)

Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the objections to Mr. Diesel’s deposition notice. (Hale Decl., ¶ 7, Exh. 6.) This letter addressed Mr. Diesel’s objections in detail, each of which was unmeritorious. Following discussion on this letter, counsel for Defendant Vin Diesel confirmed that Mr. Diesel would appear for his deposition in person on June 24 and June 25, 2025. (Hale Decl., ¶ 8, Exh. 7.) On May 13, 2025, Plaintiff’s counsel emailed counsel for Defendant to confirm that the deposition would be held at Plaintiff’s office in downtown Los Angeles and to request that they inform Plaintiff’s counsel immediately if this location was an issue. (Hale Decl., ¶ 9, Exh. 8.) That same date, May 13, 2025, Plaintiff served the notice of deposition of Defendant Vin Diesel to be conducted at the Los Angeles office of Plaintiff’s counsel on June 24 and June 25, 2025. (Hale Decl., ¶ 10, Exh. 9.)

**C. Defendant Vin Diesel Served Nearly Identical Objections Just Four Days Before His Scheduled Deposition Despite Previously Confirming His Availability.**

On June 20, 2025—four days before the deposition date that Defendant’s counsel had agreed upon more than one month earlier—counsel for Defendant Vin Diesel served objections to Plaintiff’s deposition notice via personal service. (Hale Decl., ¶ 11, Exh. 10.) This objection document closely resembled the prior objection document from April 2025, including five of the same eight objections. (See Hale Decl. ¶ 6, Exh. 5.) The only three new objections related to Vin Diesel’s purported unavailability on the date his counsel had selected, the scope of the deposition, and Defendant’s claim that the deposition location at the Los Angeles office of Plaintiff’s counsel could not “protect Defendant’s personal safety and privacy” (*Ibid.*) Plaintiff’s counsel had previously conducted in-person depositions in this matter at Plaintiff counsel’s Los Angeles office on May 28, 2025 and June 19, 2025. (Hale Decl., ¶ 12.)

That same day, June 20, 2025, Plaintiff’s counsel responded via email, meeting and conferring regarding each objection and requesting alternative dates before the fact discovery cutoff (July 18, 2025), given Vin Diesel’s asserted unavailability. (Hale Decl., ¶ 13, Exh. 11.)

**D. Defendant’s Counsel Engaged In Obstructionist Tactics, Including Physical Threats And Profanity, While Refusing To Provide Any Legitimate Reason For**

1                   **Vin Diesel's Last-Minute Unavailability.**

2           Plaintiff's counsel was scheduled to take the in-person deposition of third party witness  
3 Valentino Morales on June 23, 2025. (Hale Decl., ¶ 14.) The morning of this deposition, counsel for  
4 Defendant Vin Diesel asserted that they disagreed with Plaintiff counsel's position regarding Vin  
5 Diesel's objections to his duly noticed deposition and would meet and confer in person, later that  
6 day, on June 23, 2025. (Hale Decl., ¶ 15, Exh. 12.)

7           Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third party  
8 deponent on June 23, 2025. (Hale Decl., ¶ 16.) Prior to the deposition, Plaintiff's counsel Matthew  
9 Hale requested to meet and confer about the objections to the deposition of Vin Diesel in a separate  
10 room. (*Ibid.*) Mr. Hale and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly  
11 unavailable for his deposition. (*Ibid.*) Mr. Hale requested to know why Mr. Diesel was suddenly  
12 unavailable, and Mr. Hardy refused to provide a reason. (*Ibid.*)

13           During this back and forth, Mr. Freedman entered the room. (Hale Decl., ¶ 17.) Mr. Hale  
14 again requested to know why Mr. Diesel was unavailable to determine if this was a true emergency  
15 or a simple failure to appear for his deposition, for which availability had been cleared over a month  
16 prior, as it would be important for the purposes of any motion to compel that may need to be filed.  
17 (*Ibid.*) Counsel for Defendant continued to refuse to provide any explanation. (*Ibid.*) Mr. Freedman  
18 interjected and told Mr. Hale to just file his motion and called Mr. Hale, a "moron" and cursed while  
19 doing so. (*Ibid.*) Mr. Hale began to write down the language on note paper, specifically stating that  
20 he would be including these insults in his declaration to any Motion and requesting to have a  
21 professional and substantive meet and confer. (*Ibid.*) Mr. Freedman then threatened Mr. Hale with  
22 malicious prosecution and called him a "piece of shit." (*Ibid.*) At no time did Mr. Hale exchange  
23 any insult with Mr. Freedman, raise his voice, or provoke any physical contact. (*Ibid.*) Shortly  
24 thereafter, Mr. Freedman got up from his chair, rushed to stand directly in front of Mr. Hale mere  
25 inches away from him, causing Mr. Freedman's face to be directly in front of that of Mr. Hale.  
26 (*Ibid.*) Mr. Freedman then called Mr. Hale a "pussy" and swung his fist at Mr. Hale's face, stopping  
27 directly in front of his face without making contact. (*Ibid.*) Shocked, Mr. Hale nonetheless remained  
28 composed and attempted to address Mr. Hardy behind Mr. Freedman, in hopes that counsel could

1 get the meet and confer discussion back on track. (*Ibid.*) Shortly thereafter, Mr. Freedman left the  
 2 room, and Mr. Hale and Mr. Hardy conducted the meet and confer session, both then and after the  
 3 deposition concluded later that day. (*Ibid.*)

4 Given Mr. Diesel's asserted objection regarding the lack of security and privacy at Plaintiff's  
 5 counsel's office, Mr. Hale requested to know what was deficient about their security and/or privacy.  
 6 (Hale Decl., ¶ 18.) Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed  
 7 to be able to quickly leave the deposition for his security, including in relation to death threats,  
 8 without having to go down thirty floors and obtain his vehicle from an underground parking lot.  
 9 (*Ibid.*) Mr. Hardy also asserted that Mr. Diesel would need his personal security with him. (*Ibid.*)

10 Mr. Hale then offered to conduct the next day's deposition at defense counsel's office. (Hale  
 11 Decl., ¶ 19.) Mr. Hardy again asserted that Mr. Diesel was not in the city. (*Ibid.*) Mr. Hale asked  
 12 when Mr. Diesel left the city and where he was, but Mr. Hardy would not provide that information.  
 13 (*Ibid.*) Mr. Hardy then *for the first time* laid out several conditions for a rescheduled deposition of  
 14 Vin Diesel: (1) that the deposition be conducted for no more than seven hours; (2) that a protective  
 15 order be in place to protect Defendant's financial, medical, and sexual privacy; (3) that the  
 16 deposition take place at defense counsel's office or remotely; and (4) that the deposition only occur  
 17 following the hearing on Defendant's just-filed Motion for Summary Judgment/Adjudication, set  
 18 for October 7, 2025, nearly two months after the current trial date of August 18, 2025. (*Ibid.*)

19 At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties further  
 20 met and conferred, at an Informal Discovery Conference, or in any other venue. (Hale Decl., ¶ 20.)

#### 21 **E. Defendant's Filing of a Motion for Protective Order**

22 On the same date, June 23, 2025, Defendant Vin Diesel filed a Motion for Protective Order  
 23 on the same subset of four (4) grounds listed immediately above. As will be argued below, these  
 24 grounds are unmeritorious.

### 25 **III. LEGAL STANDARD**

26 Code of Civ. Proc., § 2025.450(a) provides as follows:

27 If, after service of a deposition notice, a party to the action or an officer, director,  
 28 managing agent, or employee of a party, or a person designated by an

organization that is a party under Section 2025.230, without having served a valid objection under Section 2025.410, fails to appear for examination, or to proceed with it, or to produce for inspection any document or tangible thing described in the deposition notice, the party giving the notice may move for an order compelling the deponent's attendance and testimony, and the production for inspection of any document or tangible thing described in the deposition notice.

#### IV. ARGUMENT

##### A. Defendant Vin Diesel's Objections to his Notice of Deposition are Invalid and Unmeritorious.

###### 1. Defendant Vin Diesel's Asserted Unavailability

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel, for the first time since his counsel provided his availability for an in-person deposition on May 9, 2025, asserted that he was not available for his deposition. (Hale Decl., ¶ 11, Exh. 10, p. 1) Neither in writing nor verbally through his counsel did Defendant communicate any true emergency to explain his availability. In fact, Mr. Diesel's counsel indicated that he was not even "in the city." Mr. Diesel's counsel declined to provide any further detail. When Plaintiff's counsel offered to conduct the deposition at defense counsel's office, as requested by Mr. Diesel, defense counsel again asserted Mr. Diesel was not "in the city."

Furthermore, "unavailability" is not an adequate objection to a duly-served deposition notice. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure section 2025.210 *et seq.*

###### 2. In-Person Attendance

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that he cannot be required to attend his deposition in-person, pursuant to *Code of Civ. Proc.*, § 2025.310(a). (Hale Decl., ¶ 11, Exh. 10, p. 1.) However, as pointed out to counsel in previous meet and confer discussions regarding an identical objection to a prior notice of deposition of Mr. Diesel, this is a misreading of that code section.

CCP § 2025.310(a) states as follows: "At the election of the deponent or the deposing party,

1 the deposition officer may attend the deposition at a different location than the deponent via remote  
2 means. A deponent is not required to be physically present with the deposition officer when being  
3 sworn in at the time of the deposition.” Thus, the code section permits the deposition officer, i.e.,  
4 the court reporter, to attend the deposition via remote means. No reference is made to the deponent’s  
5 ability to elect a remote appearance.

6 CCP § 2025.310(b), which Mr. Diesel did not cite in his objection, states as follows: “Subject  
7 to Section 2025.420, any party or attorney of record may, but is not required to, be physically present  
8 at the deposition at the location of the deponent. If a party or attorney of record elects to be physically  
9 present at the location of the deponent, all physically present participants in the deposition shall  
10 comply with local health and safety ordinances, rules, and orders.” This code section similarly does  
11 not permit Mr. Diesel to elect a remote appearance; it merely allows Mr. Diesel, or his attorney of  
12 record, to be physically present at the location of another deponent. Of course, this supports  
13 Plaintiff’s position, as Plaintiff and her attorney of record may be physically present at the deposition  
14 of the deponent in this scenario: Vin Diesel.

### 15 **3. Location of Deposition**

16 In his objection to Plaintiff’s Notice of Deposition, Mr. Diesel asserts that he should not  
17 have to attend a deposition “to the extent the deposition is noticed for a location more than 150 miles  
18 from Defendant’s residence.” (Hale Decl., ¶ 11, Exh. 10, p. 1.) Mr. Diesel failed to even  
19 straightforwardly assert that he in fact lives more than 150 miles from Plaintiff’s counsel’s office in  
20 downtown Los Angeles, where the deposition is to take place. Mr. Diesel’s objection is so vague  
21 and uncertain as to operate as a waiver of any such objection.

22 Furthermore, Samantha Vincent – Mr. Diesel’s sister – and Valentino Morales – Mr. Diesel’s  
23 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
24 Los Angeles, California. (Hale Decl., ¶ 21.) Defendant’s suggestion to hold the deposition at defense  
25 counsel’s office in Century City also confirms the convenience of Los Angeles as a location for Mr.  
26 Diesel’s deposition.

27 Finally, Plaintiff’s counsel repeatedly requested confirmation on this topic from defense  
28 counsel but was not provided with any. As recently as May 13, 2025, Plaintiff’s counsel requested

1 to confirm that the in-person location of Vin Diesel’s June 24 and 25 deposition was to be Los  
 2 Angeles, specifically Plaintiff’s counsel’s Los Angeles office. (Hale Decl., ¶ 9, Exh 8.) Of course,  
 3 this is Plaintiff’s choice to begin with, but Plaintiff extended this question as a courtesy, which  
 4 received no response from defense counsel.

#### 5 **4. Time Limit**

6 Defendant Diesel also objected that his deposition should be limited to seven-hours under  
 7 CCP § 2025.290. (Hale Decl., ¶ 11, Exh. 10, p. 1.) Pursuant to CCP § 2025.290(b)(4), depositions  
 8 in employment matters are excepted from the default seven-hour limit. While Plaintiff’s FEHA  
 9 claims have indeed been dismissed, multiple employment claims still remain, including Retaliation  
 10 in Violation of Labor Code, §§ 98.6, 1102.5 and Wrongful Termination in Violation of Public  
 11 Policy.

12 Further, the notice of deposition does not assume any particular total time to be on the record.  
 13 A full day of deposition rarely equates to seven hours on the record.

#### 14 **5. Questions Implicating Privacy**

15 “[A]ny party may obtain discovery regarding any matter, not privileged, that is relevant to  
 16 the subject matter involved in the pending action or to the determination of any motion made in that  
 17 action, if the matter either is itself admissible in evidence or appears reasonably calculated to lead  
 18 to the discovery of admissible evidence.” (*Code Civ. Proc.*, § 2017.010.) “‘Relevant’ evidence is  
 19 evidence ‘having any tendency in reason to prove or disprove any disputed fact that is of  
 20 consequence to the determination of the action.’” (*D.Z. v. Los Angeles Unified School Dist.* (2019)  
 21 35 Cal.App.5th 210, 229.) “The party asserting a privacy right must establish a legally protected  
 22 privacy interest, an objectively reasonable expectation of privacy in the given circumstances, and a  
 23 threatened intrusion that is serious.” (*Williams v. Sup. Ct.* (2017) 3 Cal.5th 531, 552.) If the court  
 24 finds a privacy interest, the court must balance the privacy concerns against the need for the  
 25 information. (*Id.* at p. 552.)

26 Defendant Vin Diesel asserts that he should not have to attend his deposition because  
 27 questions *may* be asked that implicate his privacy, including his sexual history and financial  
 28 condition. (Hale Decl., ¶ 11, Exh. 10, p. 1.)



1 First, as to Defendant's financial condition, Plaintiff is already not permitted to seek pretrial  
2 discovery on this subject. (Civ. Code, § 3295(a)(2).) As such, a protective order is altogether  
3 unnecessary. On the contrary, Plaintiff must request an order permitting such discovery to obtain it  
4 pretrial. Plaintiff has not and does not plan on doing so. Defendant cannot be permitted to delay his  
5 deposition by simply listing subjects to which Plaintiff never had the intention or ability to inquire  
6 about.

7 Second, as to Mr. Diesel's "sexual history," it is unclear as to what Defendant is referring,  
8 given the ambiguity of the phrase. As asserted in Mr. Diesel's summary judgment motion, set to be  
9 heard after trial, Plaintiff relies on *Code of Civ. Proc.*, § 340.16 to revive her claims based on  
10 wrongful conduct in 2010. With regard to claims revived by *Code of Civ. Proc.*, § 340.16(e),  
11 Plaintiff must allege the following:

12 (A) The plaintiff was sexually assaulted.

13 (B) One or more entities are legally responsible for damages arising out of the  
14 sexual assault.

15 (C) The entity or entities, including, but not limited to, their officers, directors,  
16 representatives, employees, or agents, engaged in a cover up or attempted a cover  
17 up of a previous instance or allegations of sexual assault by an alleged perpetrator  
18 of such abuse.

19 As such, questions regarding previous instances of sexual assault by Mr. Diesel are  
20 reasonably calculated to lead to the discovery of admissible evidence. Now, Mr. Diesel seeks to  
21 prevent Plaintiff from even *seeking* essential discovery, while at the same time attempting to dismiss  
22 her claims for lack of that same sought-for evidence. That said, Plaintiff is not interested in Mr.  
23 Diesel's "sexual history" wholesale. An order preventing all investigation into anything sexual with  
24 regard to Vin Diesel would necessarily prevent Plaintiff from asking questions directed toward Mr.  
25 Diesel about accusations of sexual assault or abuse previously committed by him. A stipulated  
26 protective order ("SPO") in this matter has been in place since July 25, 2024. Any particular  
27 questions that Defendant or his counsel believe run afield are better addressed on a question-by-  
28 question basis, at which time counsel may simply instruct their client not to answer. All testimony



1 will have the protection of the parties' protective order, so long as Defendant labels it as confidential,  
2 subject to the procedure in the parties' SPO to de-designate as confidential any testimony. In this  
3 scenario, a specialized protective order is a blunt tool that would prevent Plaintiff from seeking  
4 essential discovery.

5 In his recently filed Motion for Protective Order, Mr. Diesel adds multiple other types of  
6 privacy to the list, including medical and psychotherapeutic. Plaintiff has no interest in discovery  
7 on these topics, and Defendant has provided no examples of what it may be concerned about Plaintiff  
8 inquiring into. Again, Defendant cannot be permitted to delay his deposition by simply listing  
9 subjects to which Plaintiff never had the intention to inquire about and asking the Court to hear that  
10 Motion months after the parties' August 2025 trial date. Rather, the appropriate remedy is to appear  
11 for a properly noticed deposition (which was previously agreed to by defense counsel), and object  
12 on the record. This permits the Court to make specific findings as to specific questions rather than  
13 asking the Court to make premature blanket rulings on questions that have not yet been posed.

14 Finally, Defendant also adds "employment history" to the list of private topics that may not  
15 be inquired about. Defendant fails to define precisely what is meant by the ambiguous phrase.  
16 Plaintiff was employed by Defendant and his entities, so to the extent "employment history" refers  
17 to Vin Diesel's employment with Defendants One Race Films, Inc. or One Race Productions, Inc.,  
18 such topics are squarely discoverable. Other than this, Plaintiff has little interest in probing into  
19 Mr. Diesel's career path, which is already publicly known.

## 20 **6. Safety**

21 In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that Plaintiff's office  
22 is "inadequate to protect Defendant's personal safety and privacy." (Hale Decl., ¶ 11, Exh. 10, p. 2.)  
23 As is known by Defendants' counsel, Plaintiff's counsel's office is located in the PwC building on  
24 7<sup>th</sup> and Figueroa, which is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. (Hale Decl. ¶  
25 22.) Like many buildings downtown, it has multiple 24/7 dedicated security personnel. (*Ibid.*)  
26 Entrance is restricted per floor, and visitors may only access a particular floor if they have been  
27 added to a security list and been ushered to an appropriate elevator by security. (*Ibid.*) During a meet  
28 and confer session with Defense counsel, Sean Hardy explained that the concern was more about

1 the quickness with which Mr. Diesel could descend from the 30<sup>th</sup> floor and retrieve his vehicle from  
2 the building's underground parking. (Hale Decl. ¶ 18.) This is not a reasonable or rational basis for  
3 failing to attend a deposition. Further, no explanation was provided with relation to the building's  
4 inability to protect Defendant's privacy, so this is still a mystery.

5 During the in-person meet and confer, Plaintiff's counsel offered as a compromise to conduct  
6 the deposition at the office of defense counsel. (Hale Decl. ¶ 19.) Defense counsel stated that  
7 nonetheless, Mr. Diesel was "not in the city" and so would not be attending. (*Ibid.*)

8 For purposes of security, Plaintiff also suggests the deposition be held at the courthouse  
9 where there is ample security to alleviate Mr. Diesel's concerns.

#### 10 **7. Vague Procedural Deficiencies**

11 Mr. Diesel also objected "to the extent [the deposition notice] fails to comply with the  
12 requirements on Code of Civil Procedure section 2025.210, *et seq.*" (Hale Decl., ¶ 11, Exh. 10, p.  
13 2.) This objection lacks any specificity as to what requirements the notice fails to comply with, and  
14 no additional detail has been provided by counsel. This objection should be disregarded due to its  
15 vagueness and ambiguity.

#### 16 **8. Pending Dispositive Motion**

17 Defendant's final objection asserts good cause exists to stay the deposition pending  
18 Defendant's Motion for Summary Judgment/Adjudication ("MSJ"), which is scheduled to be heard  
19 on October 7, 2025, nearly two months past the parties' August 18, 2025 trial date. (Hale Decl., ¶  
20 11, Exh. 10, p. 2.) The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and  
21 *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal*  
22 and *Silver* are both cases where a plaintiff had yet to get past the pleadings stage, and each court  
23 stated that the plaintiff had to state at least one cause of action before discovery or depositions would  
24 be permitted. Of course, this matter is past the pleadings stage, is deep into fact discovery, and  
25 testimony sought at the deposition of Vin Diesel is squarely relevant to Plaintiff's preparation for  
26 Trial. Further, the MSJ should never be heard because it was filed late, and so should not be used as  
27 a sword to delay discovery and trial itself.

1           **B. Plaintiff's Counsel Adequately Met and Conferred Prior to Filing this Motion.**

2           Pursuant to Code of Civ. Proc., § 2025.450(b)(2), a motion to compel a deposition should  
3 be accompanied by a meet and confer declaration under section 2016.040 or, when the deponent  
4 fails to attend the deposition and produce the documents, electronically stored information, or things  
5 described in the deposition notice, by a declaration stating that the petitioner has contacted the  
6 deponent to inquire about the nonappearance. Plaintiff here does both. Plaintiff's counsel Matthew  
7 Hale attempted a reasonable and good faith resolution of each issued presented by this motion by  
8 meeting and conferring with opposing counsel on multiple occasions and contacted the deponent's  
9 counsel to inquire about the intended nonappearance. (Hale Decl. ¶ 13-20, Exh. 11-12.)

10           **C. Monetary Sanctions Are Appropriate Due to Defendant's Misuse of the**  
11 **Discovery Process.**

12           California Code of Civil Procedure section 2023.030(a) provides that "[t]he court may  
13 impose a monetary sanction ordering that one engaging in the misuse of the discovery process."  
14 California Code of Civil Procedure section 2023.010(d) provides that "[f]ailing to respond or to  
15 submit to an authorized method of discovery" constitutes misuse of the discovery process.  
16 California Code of Civil Procedure section 2023.010(e) provides that "making, without substantial  
17 justification, an unmeritorious objection to discovery" also constitutes misuse of the discovery  
18 process.

19           Here, sanctions against Mr. Diesel and his counsel, Liner Freedman Taitelman + Cooley, are  
20 warranted pursuant to the aforementioned code sections because Defendant has failed to appear for  
21 his properly noticed deposition. Further, Defendant's unmeritorious objections and counsel's  
22 improper conduct constitute a misuse of the discovery process and failure to respond or to submit  
23 to an authorized method of discovery.

24           Code of Civil Procedure section 2025.450(g)(1) provides:

25           If a motion under subdivision (a) is granted, *the court shall impose a monetary*  
26 *sanction* under Chapter 7 (commencing with Section 2023.010) in favor of the  
27 party who noticed the deposition and against the deponent or the party with whom  
28 the deponent is affiliated, unless the court finds that the one subject to the sanction

1 acted with substantial justification or that other circumstances make the  
 2 imposition of the sanction unjust. (Emphasis added.)

3 Defendants' conduct is a willful abuse of the discovery process for which Defendant and his  
 4 counsel should be sanctioned. Defendant has failed to appear at his duly noticed deposition, at a  
 5 date and location agreed to by the parties. Under the statutes enumerated above, plaintiff requests  
 6 sanctions in the amount of \$7,455.07 for costs and attorneys' fees. (Hale Decl. ¶ 29.)<sup>1</sup>

7 **V. CONCLUSION**

8 Accordingly, Plaintiff Asta Jonasson requests that this Court issue an order directing  
 9 Defendant to appear for deposition within the next ten (10) days, directing Defendant and his  
 10 counsel, Liner Freedman Taitelman + Cooley, to pay sanctions to plaintiff in the amount of  
 11 \$7,455.07 for this willful discovery violation.

12  
 13 DATED: June 26, 2025

GREENBERG GROSS LLP

14  
 15 By: /s/ Matthew T. Hale

16 Brian L. Williams

17 Jemma E. Dunn

18 Matthew T. Hale

19 Attorneys for Plaintiff Asta Jonasson  
 20  
 21  
 22  
 23  
 24  
 25  
 26

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27 <sup>1</sup> To the extent it solves any of Defendant's concerns, it may be prudent to appoint a discovery  
 28 referee at Mr. Freedman's expense to ensure (1) professional conduct at further in person depositions  
 and meet and confers and (2) to make decisions regarding the appropriateness of the subject matter  
 of the questions during the deposition in real time.

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S MOTION TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.	Attorneys for Defendants One Race Films, Inc.,
Sean M. Hardy, Esq.	One Race Productions, Inc., Vin Diesel f/k/a
Jason H. Sunshine, Esq.	Mark Sinclair Vincent, and Samantha Vincent

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

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cpuello@ftllp.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez

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Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**DECLARATION OF MATTHEW T. HALE IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT VIN DIESEL'S DEPOSITION & REQUEST FOR SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion; Motion to Compel; [Proposed] Order]*

**DECLARATION OF MATTHEW T. HALE**

I, Matthew T. Hale, declare as follows:

1. I am an attorney at law, duly authorized to practice law in the State of California. I am an attorney with the law firm of Greenberg Gross LLP, counsel of record for plaintiff Asta Jonasson (“Plaintiff” or “Jonasson”) in this case. The facts stated herein are within my personal knowledge and if called upon to testify, I can truthfully and competently do so as to all matters herein

2. Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024. A true and correct copy of that deposition notice is attached hereto as **Exhibit 1**.

3. On May 1, 2024, Defendant Vin Diesel served his objection to the notice of deposition, indicating in part that neither he nor his counsel were available on that date. A true and correct copy of that objection document is attached hereto as **Exhibit 2**.

4. On April 7, 2025, Plaintiff again noticed Mr. Diesel’s deposition, this time for April 29, 2025. A true and correct copy of that deposition notice is attached hereto as **Exhibit 3**.

5. Plaintiff accompanied the notice of deposition with a letter requesting alternative dates if April 29, 2025 did not work for Mr. Diesel or his attorneys. A true and correct copy of that letter is attached hereto as **Exhibit 4**.

6. No response was received to that letter until Mr. Diesel’s objections to the deposition notice were served via overnight mail on April 24, 2025. A true and correct copy of that objection document is attached hereto as **Exhibit 5**.

7. Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the objections to Mr. Diesel’s deposition notice. A true and correct copy of that letter is attached hereto as **Exhibit 6**.

8. Following discussion on this letter, counsel for Defendant Vin Diesel confirmed that he would appear for his deposition in person on June 24 and June 25. A true and correct copy of the confirming email from Jason Sunshine is attached hereto as **Exhibit 7**.

9. On May 13, 2025, Plaintiff’s counsel emailed counsel for Defendant confirming that the deposition would be held at Plaintiff’s office downtown Los Angeles and to inform Plaintiff’s

1 counsel immediately if this was an issue. A true and correct copy of the confirming email from  
2 Matthew Hale is attached hereto as **Exhibit 8**.

3 10. That same date, May 13, 2025, Plaintiff served the notice of deposition of Defendant  
4 Vin Diesel to be conducted at Plaintiff counsel's Los Angeles office for June 24 and June 25., 2025  
5 A true and correct copy of that deposition notice is attached hereto as **Exhibit 9**.

6 11. On June 20, 2025, counsel for Defendant Vin Diesel served via personal service its  
7 objections to Plaintiff's deposition notice, served on May 13, 2025. A true and correct copy of that  
8 objection document is attached hereto as **Exhibit 10**.

9 12. Plaintiff's counsel had previously conducted in-person depositions in this matter at  
10 Plaintiff counsel's Los Angeles office on May 28, 2025 and June 19, 2025.

11 13. That same day, June 20, 2025, Plaintiff's counsel responded via email, meeting and  
12 conferring regarding each objection and requesting alternative dates before the fact discovery cutoff  
13 (July 18, 2025), given Vin Diesel's asserted unavailability. A true and correct copy of that email is  
14 attached hereto as **Exhibit 11**.

15 14. Plaintiff's counsel was scheduled to take the in-person deposition of third party  
16 witness Valentino Morales on June 23, 2025.

17 15. The morning of this deposition, counsel for Defendant Vin Diesel asserted that they  
18 disagreed with Plaintiff counsel's position regarding Vin Diesel's objections to his duly noticed  
19 deposition and would meet and confer in person later that day, on June 23, 2025. A true and correct  
20 copy of that email from Sean Hardy is attached hereto as **Exhibit 12**.

21 16. Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third  
22 party deponent on June 23, 2025. Prior to the deposition, Plaintiff's counsel Matthew Hale requested  
23 to meet and confer about the objections to the deposition of Vin Diesel in a separate room. Mr. Hale  
24 and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly unavailable for his  
25 deposition. Mr. Hale requested to know why Mr. Diesel was suddenly unavailable, and Mr. Hardy  
26 refused to provide a reason.

27 17. During this back and forth, Mr. Freedman entered the room. Mr. Hale again requested  
28 to know why Mr. Diesel was unavailable to determine if this was a true emergency or a simple



1 failure to appear for his deposition, for which availability had been cleared over a month prior, as it  
2 would be important for the purposes of any Motion to compel that may need to be filed. Counsel for  
3 Defendant continued to refuse to provide any explanation. Mr. Freedman interjected and told Mr.  
4 Hale to just file his motion and called Mr. Hale, a “moron” and cursed while doing so. Mr. Hale  
5 began to write down the language on note paper, specifically stating that he would be including  
6 these insults in his declaration to any motion and requesting to have a professional and substantive  
7 meet and confer. Mr. Freedman then threatened Mr. Hale with malicious prosecution and called  
8 him a “piece of shit.” At no time did Mr. Hale exchange any insult with Mr. Freedman, raise his  
9 voice, or provoke any physical contact. Shortly thereafter, Mr. Freedman got up from his chair,  
10 rushed to stand directly in front of Mr. Hale, mere inches away from him, causing Mr. Freedman’s  
11 face to be directly in front of that of Mr. Hale. Mr. Freedman then called Mr. Hale a “pussy” and  
12 swung his fist at Mr. Hale’s face, stopping directly in front of his face, without making contact.  
13 Shocked, Mr. Hale nonetheless remained composed and attempted to address Mr. Hardy behind Mr.  
14 Freedman, in hopes that counsel could get the meet and confer discussion back on track. At some  
15 point shortly thereafter, Mr. Freedman left the room, and Mr. Hale and Mr. Hardy conducted the  
16 meet and confer session, both then and after the deposition concluded later that day.

17 18. Given Mr. Diesel’s asserted objection regarding the lack of security and privacy at  
18 Plaintiff’s counsel’s office, Mr. Hale requested to know what was deficient about their security  
19 and/or privacy. Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed to  
20 be able to quickly leave the deposition for his security, including in relation to death threats, without  
21 having to go down thirty floors and obtain his vehicle from an underground parking lot. Mr. Hardy  
22 also asserted that Mr. Diesel would need his personal security with him.

23 19. Mr. Hale then offered to conduct the next day’s deposition at defense counsel’s  
24 office. Mr. Hardy again asserted that Mr. Diesel was not in the city. Mr. Hale asked when Mr. Diesel  
25 left the city and where he was, but Mr. Hardy would not provide that information. Mr. Hardy laid  
26 out several conditions for a rescheduled deposition of Vin Diesel: (1) that the deposition be  
27 conducted for no more than seven hours; (2) that a protective order be in place to protect Defendant’s  
28 financial, medical, and sexual privacy; (3) that the deposition take place at defense counsel’s office

1 or remotely; and (4) that the deposition only occur following the hearing on Defendant's just-filed  
2 Motion for Summary Judgment/Adjudication, set for October 7, 2025, nearly two months after the  
3 current trial date of August 18, 2025.

4 20. At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties  
5 further met and conferred, at an Informal Discovery Conference, or in any other venue.

6 21. Samantha Vincent – Mr. Diesel's sister – and Valentino Morales – Mr. Diesel's  
7 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
8 Los Angeles, California.

9 22. Plaintiff's counsel's office is located in the PwC building on 7<sup>th</sup> and Figueroa, which  
10 is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. Like many buildings downtown, it has  
11 multiple 24/7 dedicated security personnel. Entrance is restricted per floor, and visitors may only  
12 access a particular floor if they have been added to a security list and been ushered to an appropriate  
13 elevator by security.

14 23. I have been practicing law since 2015. I primarily litigate wrongful termination of  
15 employment and discrimination cases in both state and federal court on behalf of plaintiffs, including  
16 cases based upon violations of the Fair Employment and Housing Act and the California Labor  
17 Code.

18 24. I am a graduate of the University of California, Los Angeles, School of Law and of  
19 Harvard University.

20 25. In January of 2023, my colleagues and I tried Galvan v. United Parcel Service, et al.  
21 (LASC Case No. BC703891), which resulted in a \$5.4 million verdict.

22 26. I have been confirmed legal fees at an hourly rate of \$850.00 by Judge Lipner of  
23 Department 72.

24 27. Throughout my practice as an attorney on plaintiff's side, I have become familiar  
25 with customary billing rates for attorneys of my experience level and title. I understand that my  
26 hourly rate as an associate attorney of a plaintiff's law firm is at least comparable, if not below, the  
27 hourly rates of other attorneys in similar situations.

28 28. I am familiar with the proper procedure for calculating hourly bills. I understand

1 which tasks are billable and which are not. All of the time that I spent on this motion was necessary  
2 to prepare it properly and diligently.

3 29. I have primarily handled the discovery issues in this action. I have spent  
4 approximately one hour meeting and conferring with Defendant's counsel regarding the motion,  
5 including drafting and revising correspondence and participating in conferences regarding the  
6 same. I also spent more than 5 hours preparing and revising all briefing in connection with the  
7 instant Motion to Compel, including in preparing this declaration and preparing and revising the  
8 brief, notice, and proposed order (6 hours X \$850.00 = \$5,100.00). I anticipate that it will take me  
9 an additional 2.5 hours to review Defendant's opposition, prepare a reply brief in support of the  
10 motion, and prepare for and attend oral argument on this motion (2.5 hours X \$850.00 = \$2,125.00).  
11 I was also required to cancel my hotel reservation due to the cancellation of Defendant's deposition,  
12 with a fee in the amount of \$230.07. As such, Plaintiff has incurred fees and costs in the amount of  
13 \$5,330.07 and is likely to incur costs in the amount of \$2,125.00, for a total of \$7,455.07.

14 I declare, under penalty of perjury under the laws of the State of California, that the foregoing  
15 is true and correct.

16 Date: June 26, 2025.

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18 Matthew T. Hale  
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# Journal Technologies Court Portal

## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

### Fees

Description	Fee	Qty	Amount
Motion to Compel (name extension)	0.00	1	0.00
TOTAL			\$0.00

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

Print Receipt

Reserve Another Hearing

View My Reservations



# EXHIBIT 1

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
CLAIRE-LISE Y. KUTLAY, State Bar No. 307080  
*CKutlay@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT)**

Date: May 7, 2024  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: Not Yet Set


1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of Defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on May 7,  
6 2024, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 DATED: February 26, 2024

GREENBERG GROSS LLP

11 By:

  
\_\_\_\_\_  
12 Brian L. Williams  
13 Claire-Lise Y. Kutlay  
14 Matthew T. Hale  
15 Attorneys for Plaintiff Asta Jonasson  
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# **EXHIBIT 2**

FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
Tel: (310) 201-0005  
bfreedman@ftllp.com  
smhardy@ftllp.com  
jsunshine@ftllp.com

Attorneys for Defendant  
VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M. Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT)**

**Date: May 7, 2024**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the May 7, 2024 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310, that any deposition proceed via remote video, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets without the entry of a mutually-acceptable protective order.

5. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

6. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

1           7. Defendant objects to the Notice to the extent it fails to comply with the  
2 requirements on Code of Civil Procedure section 2025.210, *et seq.*

3  
4 DATED: May 1, 2024

FREEDMAN TAITELMAN + COOLEY, LLP

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7 \_\_\_\_\_  
8 Bryan J. Freedman, Esq.  
9 Sean M. Hardy, Esq.  
10 Jason H. Sunshine, Esq.  
11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR  
13 VINCENT)  
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**PROOF OF SERVICE**

1  
2 **STATE OF CALIFORNIA**                    |  
  | **ss.**  
3 **COUNTY OF LOS ANGELES**            |

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18,  
5 and not a party to the within action. My business address is FREEDMAN TAITELMAN +  
COOLEY, LLP, 1801 Century Park West, 5th Floor, Los Angeles, CA 90067.

6 On **May 1, 2024**, I served the following document(s) entitled **OBJECTIONS TO**  
7 **NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR**  
**VINCENT)** on the interested parties in this action as follows:

8 Brian L. Williams  
9 Claire-Lise Y. Kutlay  
10 Matthew T. Hale  
11 GREENBERG GROSS LLP  
12 601 S. Figueroa Street, 30<sup>th</sup> Floor  
13 Los Angeles, California 90017  
14 Tel. (213) 334-7000  
15 Fax. (213) 334-7001  
16 [BWilliams@GGTrialLaw.com](mailto:BWilliams@GGTrialLaw.com)  
[CKutlay@GGTrialLaw.com](mailto:CKutlay@GGTrialLaw.com)  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)  
[PHorlacher@GGTrialLaw.com](mailto:PHorlacher@GGTrialLaw.com)  
[DVultaggio@GGTrialLaw.com](mailto:DVultaggio@GGTrialLaw.com)  
[CRose@GGTrialLaw.com](mailto:CRose@GGTrialLaw.com)  
[MSance@GGTrialLaw.com](mailto:MSance@GGTrialLaw.com)

17 *Attorneys for Plaintiff Asta Jonasson*

19 <input checked="" type="checkbox"/>	<b>By Overnight Delivery.</b> I deposited a sealed envelope containing a true and correct copy of the documents listed above for overnight delivery via Federal Express.
21 <input checked="" type="checkbox"/>	<b>By E-Mail or Electronic Transmission.</b> I caused the documents to be sent to the persons at the email address listed below in a PDF file, and the transmission appeared to be successful.

23  
24 I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

25 Executed on **May 1, 2024**, at Los Angeles, California.

27 /s/ Vaneta D. Birtha  
28 Vaneta D. Birtha

# **EXHIBIT 3**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT) AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS**

Date: April 29, 2025  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on April 29,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters



1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.



1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

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1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: April 7, 2025

GREENBERG GROSS LLP

5  
6 By: 

7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

# **EXHIBIT 4**



**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

April 7, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

Enclosed please find notices of deposition for defendants Vin Diesel and Samantha Vincent and witnesses Valentino Morales and Thyrale Thai. If any of the noticed dates are not workable for the deponents' schedules, please let us know as soon as possible, and propose alternative dates that fall before the end of May 2025. Furthermore, counsel has previously objected that defendants Vin Diesel and Samantha Vincent *may* not reside within 150 miles of downtown Los Angeles. If these defendants do not reside within 150 miles of downtown Los Angeles, please notify our office of these defendants' city of residence, and we will coordinate a convenient location.

We are happy to accommodate reasonable scheduling conflicts, but considering the upcoming trial date, we will be completing these depositions by the end of May 2025.

Very truly yours,

Matthew T. Hale

Encls.

# **EXHIBIT 5**

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
2 Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
3 1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
4 Tel: (310) 201-0005  
bfreedman@lftcllp.com  
5 smhardy@lftcllp.com  
jsunshine@lftcllp.com

6 Attorneys for Defendant  
7 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10  
11 ASTA JONASSON, an individual,

12 Plaintiff,

13 vs.

14 VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
15 individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
16 FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,

17 Defendants.  
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Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

**Date: April 29, 2025**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**



**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the April 29, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

5. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

6. Defendant objects to the Notice to the extent it fails to comply with the requirements on Code of Civil Procedure section 2025.210, *et seq.*

7. Defendant objects to the 14 requests for production of documents in connection with the Notice. Plaintiff served the requests for production of documents on April 7, 2025 by electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*, which contemplates 32 days when responding to document requests served by electronic service. See Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## II.

### **INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION**

The following responses are made solely for the purpose of this action. Any document or thing supplied in response to any request is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or thing, or portion thereof, if such document or thing were offered in evidence, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,

1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

### 7 III.

#### 8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010. et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010. et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010. *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

#### IV.

### **OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

1 Defendant objects to the request on the grounds that it seeks documents that are neither  
2 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Defendant objects to the request on the grounds that the request fails to designate the  
4 documents to be inspected either by specifically describing each individual item or by reasonably  
5 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
6 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
7 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

8 Defendant objects to the request on the grounds that to comply with the request would be  
9 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
10 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
11 Defendant.

12 Defendant objects to this request on the grounds it requests Defendant to search  
13 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
14 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
15 the ESI.

16 Defendant objects to this request on the grounds it seeks information of Defendant and third  
17 parties that is protected by the right to privacy.

18 Defendant objects to the request on the grounds that it is overly broad and unduly  
19 burdensome.

20 Defendant objects to the request on the grounds that it is vague, ambiguous and  
21 unintelligible.

22 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
23 other discovery propounded by Plaintiff to Defendant in this litigation.

24 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
25 to Defendant's financial condition in violation of California Civil Code § 3295.

26 Defendant objects to the request on the ground that it improperly seeks discovery relating  
27 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
28 Cal.App.4th 475, 480-481.



Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search



1 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
2 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
3 the ESI.

4 Defendant objects to this request on the grounds it seeks information of Defendant and third  
5 parties that is protected by the right to privacy.

6 Defendant objects to the request on the grounds that it is overly broad and unduly  
7 burdensome.

8 Defendant objects to the request on the grounds that it is vague, ambiguous and  
9 unintelligible.

10 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
11 other discovery propounded by Plaintiff to Defendant in this litigation.

12 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
13 to Defendant’s financial condition in violation of California Civil Code § 3295.

14 Defendant objects to the request on the ground that it improperly seeks discovery relating  
15 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
16 Cal.App.4th 475, 480-481.

17 Defendant objects to the request to the extent it seeks the production of records protected  
18 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
19 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

20 **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

21 Defendant incorporates the Preliminary Statement and General Objections as though fully  
22 set forth herein.

23 Defendant objects to the request on the grounds that it seeks documents from a remote time  
24 period.

25 Defendant objects to the request on the grounds that it seeks documents and  
26 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
27 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

28 Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential information protected by the right to privacy under the California or United States  
2 Constitution or applicable statutory or common law.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential business or proprietary information protected by trade secret.

5 Defendant objects to the request on the grounds that it seeks documents that are neither  
6 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

7 Defendant objects to the request on the grounds that the request fails to designate the  
8 documents to be inspected either by specifically describing each individual item or by reasonably  
9 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

10 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
11 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

12 Defendant objects to the request on the grounds that to comply with the request would be  
13 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
14 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
15 Defendant.

16 Defendant objects to this request on the grounds it requests Defendant to search  
17 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
18 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
19 the ESI.

20 Defendant objects to this request on the grounds it seek information of Defendant and third  
21 parties that is protected by the right to privacy.

22 Defendant objects to the request on the grounds that it is overly broad and unduly  
23 burdensome.

24 Defendant objects to the request on the grounds that it is vague, ambiguous and  
25 unintelligible.

26 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
27 other discovery propounded by Plaintiff to Defendant in this litigation.

28 Defendant objects to the request on the grounds that it improperly seeks discovery relating

1 to Defendant's financial condition in violation of California Civil Code § 3295.

2 Defendant objects to the request on the ground that it improperly seeks discovery relating  
3 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
4 Cal.App.4th 475, 480-481.

5 Defendant objects to the request to the extent it seeks the production of records protected  
6 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
7 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

8 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

9 Defendant incorporates the Preliminary Statement and General Objections as though fully  
10 set forth herein.

11 Defendant objects to the request on the grounds that it seeks documents from a remote time  
12 period.

13 Defendant objects to the request on the grounds that it seeks documents and  
14 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
15 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential information protected by the right to privacy under the California or United States  
18 Constitution or applicable statutory or common law.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential business or proprietary information protected by trade secret.

21 Defendant objects to the request on the grounds that it seeks documents that are neither  
22 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

23 Defendant objects to the request on the grounds that the request fails to designate the  
24 documents to be inspected either by specifically describing each individual item or by reasonably  
25 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
26 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
27 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

28 Defendant objects to the request on the grounds that to comply with the request would be

1 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
2 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
3 Defendant.

4 Defendant objects to this request on the grounds it requests Defendant to search  
5 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
6 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
7 the ESI.

8 Defendant objects to this request on the grounds it seeks information of Defendant and third  
9 parties that is protected by the right to privacy.

10 Defendant objects to the request on the grounds that it is overly broad and unduly  
11 burdensome.

12 Defendant objects to the request on the grounds that it is vague, ambiguous and  
13 unintelligible.

14 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
15 other discovery propounded by Plaintiff to Defendant in this litigation.

16 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
17 to Defendant’s financial condition in violation of California Civil Code § 3295.

18 Defendant objects to the request on the ground that it improperly seeks discovery relating  
19 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
20 Cal.App.4th 475, 480-481.

21 Defendant objects to the request to the extent it seeks the production of records protected  
22 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
23 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

24 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
28 period.

1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
23 the ESI.

24 Defendant objects to this request on the grounds it seeks information of Defendant and third  
25 parties that is protected by the right to privacy.

26 Defendant objects to the request on the grounds that it is overly broad and unduly  
27 burdensome.

28 Defendant objects to the request on the grounds that it is vague, ambiguous and

1 unintelligible.

2 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
3 other discovery propounded by Plaintiff to Defendant in this litigation.

4 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
5 to Defendant's financial condition in violation of California Civil Code § 3295.

6 Defendant objects to the request on the ground that it improperly seeks discovery relating  
7 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
8 Cal.App.4th 475, 480-481.

9 Defendant objects to the request to the extent it seeks the production of records protected  
10 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
11 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

12 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

13 Defendant incorporates the Preliminary Statement and General Objections as though fully  
14 set forth herein.

15 Defendant objects to the request on the grounds that it seeks documents from a remote time  
16 period.

17 Defendant objects to the request on the grounds that it seeks documents and  
18 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
19 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential information protected by the right to privacy under the California or United States  
22 Constitution or applicable statutory or common law.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential business or proprietary information protected by trade secret.

25 Defendant objects to the request on the grounds that it seeks documents that are neither  
26 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

27 Defendant objects to the request on the grounds that the request fails to designate the  
28 documents to be inspected either by specifically describing each individual item or by reasonably

1 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
2 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
3 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

4 Defendant objects to the request on the grounds that to comply with the request would be  
5 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
6 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
7 Defendant.

8 Defendant objects to this request on the grounds it requests Defendant to search  
9 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
10 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
11 the ESI.

12 Defendant objects to this request on the grounds it seeks information of Defendant and third  
13 parties that is protected by the right to privacy.

14 Defendant objects to the request on the grounds that it is overly broad and unduly  
15 burdensome.

16 Defendant objects to the request on the grounds that it is vague, ambiguous and  
17 unintelligible.

18 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
19 other discovery propounded by Plaintiff to Defendant in this litigation.

20 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
21 to Defendant’s financial condition in violation of California Civil Code § 3295.

22 Defendant objects to the request on the ground that it improperly seeks discovery relating  
23 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
24 Cal.App.4th 475, 480-481.

25 Defendant objects to the request to the extent it seeks the production of records protected  
26 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
27 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.



**OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produced the ESI.



1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

3 Defendant objects to the request on the grounds that it is overly broad and unduly  
4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

18 Defendant incorporates the Preliminary Statement and General Objections as though fully  
19 set forth herein.

20 Defendant objects to the request on the grounds that it seeks documents from a remote time  
21 period.

22 Defendant objects to the request on the grounds that it seeks documents and  
23 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
24 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

25 Defendant objects to the request on the grounds that it seeks documents that contain  
26 confidential information protected by the right to privacy under the California or United States  
27 Constitution or applicable statutory or common law.

28 Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential business or proprietary information protected by trade secret.

2 Defendant objects to the request on the grounds that it seeks documents that are neither  
3 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 Defendant objects to the request on the grounds that the request fails to designate the  
5 documents to be inspected either by specifically describing each individual item or by reasonably  
6 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
7 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
8 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

9 Defendant objects to the request on the grounds that to comply with the request would be  
10 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
11 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
12 Defendant.

13 Defendant objects to this request on the grounds it requests Defendant to search  
14 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
15 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
16 the ESI.

17 Defendant objects to this request on the grounds it seeks information of Defendant and third  
18 parties that is protected by the right to privacy.

19 Defendant objects to the request on the grounds that it is overly broad and unduly  
20 burdensome.

21 Defendant objects to the request on the grounds that it is vague, ambiguous and  
22 unintelligible.

23 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
24 other discovery propounded by Plaintiff to Defendant in this litigation.

25 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
26 to Defendant’s financial condition in violation of California Civil Code § 3295.

27 Defendant objects to the request on the ground that it improperly seeks discovery relating  
28 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114

1 Cal.App.4th 475, 480-481.

2 Defendant objects to the request to the extent it seeks the production of records protected  
3 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
4 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

5 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

6 Defendant incorporates the Preliminary Statement and General Objections as though fully  
7 set forth herein.

8 Defendant objects to the request on the grounds that it seeks documents from a remote time  
9 period.

10 Defendant objects to the request on the grounds that it seeks documents and  
11 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
12 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

13 Defendant objects to the request on the grounds that it seeks documents that contain  
14 confidential information protected by the right to privacy under the California or United States  
15 Constitution or applicable statutory or common law.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential business or proprietary information protected by trade secret.

18 Defendant objects to the request on the grounds that it seeks documents that are neither  
19 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Defendant objects to the request on the grounds that the request fails to designate the  
21 documents to be inspected either by specifically describing each individual item or by reasonably  
22 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
23 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
24 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

25 Defendant objects to the request on the grounds that to comply with the request would be  
26 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
27 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
28 Defendant.

1 Defendant objects to this request on the grounds it requests Defendant to search  
2 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
3 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
4 the ESI.

5 Defendant objects to this request on the grounds it seeks information of Defendant and third  
6 parties that is protected by the right to privacy.

7 Defendant objects to the request on the grounds that it is overly broad and unduly  
8 burdensome.

9 Defendant objects to the request on the grounds that it is vague, ambiguous and  
10 unintelligible.

11 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
12 other discovery propounded by Plaintiff to Defendant in this litigation.

13 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
14 to Defendant’s financial condition in violation of California Civil Code § 3295.

15 Defendant objects to the request on the ground that it improperly seeks discovery relating  
16 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
17 Cal.App.4th 475, 480-481.

18 Defendant objects to the request to the extent it seeks the production of records protected  
19 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
20 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

21 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

22 Defendant incorporates the Preliminary Statement and General Objections as though fully  
23 set forth herein.

24 Defendant objects to the request on the grounds that it seeks documents from a remote time  
25 period.

26 Defendant objects to the request on the grounds that it seeks documents and  
27 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
28 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

1 Defendant objects to the request on the grounds that it seeks documents that contain  
2 confidential information protected by the right to privacy under the California or United States  
3 Constitution or applicable statutory or common law.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential business or proprietary information protected by trade secret.

6 Defendant objects to the request on the grounds that it seeks documents that are neither  
7 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

8 Defendant objects to the request on the grounds that the request fails to designate the  
9 documents to be inspected either by specifically describing each individual item or by reasonably  
10 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
11 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
12 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

13 Defendant objects to the request on the grounds that to comply with the request would be  
14 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
15 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
16 Defendant.

17 Defendant objects to this request on the grounds it requests Defendant to search  
18 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
19 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
20 the ESI.

21 Defendant objects to this request on the grounds it seeks information of Defendant and third  
22 parties that is protected by the right to privacy.

23 Defendant objects to the request on the grounds that it is overly broad and unduly  
24 burdensome.

25 Defendant objects to the request on the grounds that it is vague, ambiguous and  
26 unintelligible.

27 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
28 other discovery propounded by Plaintiff to Defendant in this litigation.

1 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
2 to Defendant's financial condition in violation of California Civil Code § 3295.

3 Defendant objects to the request on the ground that it improperly seeks discovery relating  
4 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
5 Cal.App.4th 475, 480-481.

6 Defendant objects to the request to the extent it seeks the production of records protected  
7 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
8 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

9 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

10 Defendant incorporates the Preliminary Statement and General Objections as though fully  
11 set forth herein.

12 Defendant objects to the request on the grounds that it seeks documents from a remote time  
13 period.

14 Defendant objects to the request on the grounds that it seeks documents and  
15 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
16 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

17 Defendant objects to the request on the grounds that it seeks documents that contain  
18 confidential information protected by the right to privacy under the California or United States  
19 Constitution or applicable statutory or common law.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential business or proprietary information protected by trade secret.

22 Defendant objects to the request on the grounds that it seeks documents that are neither  
23 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 Defendant objects to the request on the grounds that the request fails to designate the  
25 documents to be inspected either by specifically describing each individual item or by reasonably  
26 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
27 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
28 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

1 Defendant objects to the request on the grounds that to comply with the request would be  
 2 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 3 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 4 Defendant.

5 Defendant objects to this request on the grounds it requests Defendant to search  
 6 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
 7 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
 8 the ESI.

9 Defendant objects to this request on the grounds it seek information of Defendant and third  
 10 parties that is protected by the right to privacy.

11 Defendant objects to the request on the grounds that it is overly broad and unduly  
 12 burdensome.

13 Defendant objects to the request on the grounds that it is vague, ambiguous and  
 14 unintelligible.

15 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
 16 other discovery propounded by Plaintiff to Defendant in this litigation.

17 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
 18 to Defendant’s financial condition in violation of California Civil Code § 3295.

19 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 20 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 21 Cal.App.4th 475, 480-481.

22 Defendant objects to the request to the extent it seeks the production of records protected  
 23 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 24 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 28 period.



1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
the ESI.

23 Defendant objects to this request on the grounds it seeks information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.



1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

1 Defendant objects to the request on the grounds that it seeks documents from a remote time  
2 period.

3 Defendant objects to the request on the grounds that it seeks documents and  
4 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
5 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential information protected by the right to privacy under the California or United States  
8 Constitution or applicable statutory or common law.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential business or proprietary information protected by trade secret.

11 Defendant objects to the request on the grounds that it seeks documents that are neither  
12 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

13 Defendant objects to the request on the grounds that the request fails to designate the  
14 documents to be inspected either by specifically describing each individual item or by reasonably  
15 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
16 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
17 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

18 Defendant objects to the request on the grounds that to comply with the request would be  
19 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
20 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
21 Defendant.

22 Defendant objects to this request on the grounds it requests Defendant to search  
23 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
24 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
25 the ESI.

26 Defendant objects to this request on the grounds it seeks information of Defendant and third  
27 parties that is protected by the right to privacy.

28 Defendant objects to the request on the grounds that it is overly broad and unduly  
burdensome.

1 Defendant objects to the request on the grounds that it is vague, ambiguous and  
2 unintelligible.

3 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
4 other discovery propounded by Plaintiff to Defendant in this litigation.


5 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
6 to Defendant's financial condition in violation of California Civil Code § 3295.

7 Defendant objects to the request on the ground that it improperly seeks discovery relating  
8 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
9 Cal.App.4th 475, 480-481.

10 Defendant objects to the request to the extent it seeks the production of records protected  
11 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
12 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

13  
14 DATED: April 24, 2025

LINER FREEDMAN TAITELMAN + COOLEY, LLP

15  
16   
17 Bryan J. Freedman, Esq.  
18 Sean M. Hardy, Esq.  
19 Jason H. Sunshine, Esq.  
20 Attorneys for Defendant  
21 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

1  
2 **STATE OF CALIFORNIA** |  
3 **COUNTY OF LOS ANGELES** | ss.  
4

5 I am employed in the County of Los Angeles, State of California. I am over the age of  
6 18 and not a party to the within action; my business address is 1801 Century Park West, 5<sup>th</sup> Floor,  
7 Los Angeles, California 90067.

8 On **April 24, 2025**, I served the foregoing document(s) entitled **OBJECTIONS TO  
9 NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR  
10 VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested  
11 parties in this action as follows:

12 Brian L. Williams 13 Claire-Lise Y. Kutlay 14 Matthew T. Hale 15 Philip A. Horlacher 16 Kathie Lee 17 Crystal M. Rose 18 Maria Sance 19 GREENBERG GROSS LLP 20 601 S. Figueroa Street, 30 <sup>th</sup> Floor 21 Los Angeles, California 90017 22 Tel. (213) 334-7000 23 Fax. (213) 334-7001 24 25 <i>Attorneys for Plaintiff Asta Jonasson</i>	<a href="mailto:BWilliams@GGTrialLaw.com">BWilliams@GGTrialLaw.com</a> <a href="mailto:CKutlay@GGTrialLaw.com">CKutlay@GGTrialLaw.com</a> <a href="mailto:MHale@GGTrialLaw.com">MHale@GGTrialLaw.com</a> <a href="mailto:PHorlacher@GGTrialLaw.com">PHorlacher@GGTrialLaw.com</a> <a href="mailto:KLee@GGTrialLaw.com">KLee@GGTrialLaw.com</a> <a href="mailto:CRose@GGTrialLaw.com">CRose@GGTrialLaw.com</a> <a href="mailto:MSance@GGTrialLaw.com">MSance@GGTrialLaw.com</a>
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26 ☒ **By Overnight Mail:** by placing the document(s) listed above in a sealed Federal Express  
27 envelope and affixing a pre-paid air bill and causing the envelope to be delivered to a Federal  
28 Express agent for next business day delivery to the address(es) listed below.

I declare under penalty of perjury under the laws of the State of California that the above is  
true and correct. Executed on **April 24, 2025**, at Los Angeles, California.

/s/ Vaneta D. BIRTHA  
Vaneta D. BIRTHA

# **EXHIBIT 6**



**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

May 1, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

I write to meet and confer regarding Vin Diesel's general objections to Plaintiff's deposition subpoena.

First, Mr. Diesel's objection based on scheduling is not well-taken. Plaintiff is not required to "clear dates" before noticing a deposition. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure sections 2025.210 and 2020.220. Plaintiff already initiated a good faith effort to coordinate the deposition, and your office failed to respond in any way until making the instant objection.

Second, Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."

Third, Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. My April 7, 2025 letter even inquired about this previously stated objection, but Mr. Diesel chose to reuse this equivocal objection nonetheless.





May 1, 2025

Page 2

Fourth, Ms. Jonasson's deposition has not been noticed for any future date, no less in the "reasonably near future," as required by the related LASC Local Rule. Defendant has chosen to not re-notice Plaintiff's deposition since early 2024.

Fifth, there is no seven hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.

Sixth, the objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.

Seventh, this objection does not relate to Mr. Diesel sitting for his deposition but rather to the documents demanded in the notice. This dispute will be addressed elsewhere.

Eighth, the objection merely asserts good cause exists to stay the deposition pending the MJOP. The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal* and *Silver* are both cases where a plaintiff has yet to get past the pleadings stage and the court stated that the plaintiff had to state at least one cause of action before discovery or deposition would be permitted. Of course, this matter is past the pleadings stage, and the MJOP does not even relate to each and every cause of action. Furthermore, the Defendants would need to file a Motion to Stay Discovery in order to stay fact discovery, and they have not done so.

Please let us know when you are available for a call on these topics tomorrow or early next week. Thereafter, we will need to seek relief from the Court.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Matthew T. Hale', written in a cursive style.

Matthew T. Hale



# **EXHIBIT 7**

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**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, May 9, 2025 5:18 PM  
**To:** Matthew T. Hale  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** [EXT] RE: Jonasson v. Diesel, et al.

Matt:

Further to our meet and confer discussion on Monday, we can confirm that Samantha Vincent is available for deposition on May 29. Non-party Valentino Morales is available for deposition on June 3. Vin Diesel is available in-person on June 24 and June 25. Please confirm those dates, so we can lock them in. We are in the process of obtaining availability from non-party Thyrale Thai and should be in a position to offer the same to you next week. Additionally, per our prior request and discussion, please provide Ms. Jonasson's availability for deposition during this period. Finally, per our prior proposal and discussion on Monday, we reiterate that we have confirmed that Department 71 accepts stipulations and proposed orders to continue trial dates, and that we are amenable to doing so given your protestations regarding timing constraints.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
Cell: (917) 841-8716  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [ftllp.com](http://ftllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

# **EXHIBIT 8**

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**From:** Matthew T. Hale  
**Sent:** Tuesday, May 13, 2025 10:12 AM  
**To:** Jason Sunshine  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** RE: Jonasson v. Diesel, et al.

Hi Jason,

Yes, I'll presume the in-person location is Los Angeles, but please let us know immediately if this is not correct. In the interim, we'll notice them for our LA office. I can confirm the dates for Valentino Morales (6/3) and Vin Diesel (6/24-25). We will notice these depositions shortly.

We will need additional dates for Samantha Vincent's deposition as 5/29 does not work for us. Please provide those and dates for Ms. Thai as soon as possible. Thank you.

We are not amenable to continuing the trial.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)



Los Angeles | Orange County | Las Vegas | New York

# **EXHIBIT 9**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**AMENDED NOTICE OF DEPOSITION  
TO DEFENDANT VIN DIESEL (F/K/A  
MARK SINCLAIR VINCENT) AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Date: June 24-25, 2025  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on June 24-25,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters

1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.





1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

22 ///

23 ///

24 ///

25 ///

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27 ///

28 ///

1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: May 13, 2025

GREENBERG GROSS LLP

5  
6 By: 

7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On May 13, 2025, I served true copies of the following document(s) described as **AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.  
Sean M. Hardy, Esq.  
Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Emails: bfreedman@lftcllp.com;  
smhardy@lftcllp.com;  
jsunshine@lftcllp.com;  
vbirtha@lftcllp.com;  
cpuello@lftcllp.com;

Attorneys for Defendants Once Race Films, Inc.,  
One Race Production, Inc., Vin Diesel f/k/a Mark  
Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 13, 2025, at Los Angeles, California.



Hazelle T Nunez

# **EXHIBIT 10**

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
2 Bryan J. Freedman, Esq. (SBN 151990)  
3 Sean M. Hardy, Esq. (SBN 266466)  
4 Jason Sunshine (SBN 336062)  
5 1801 Century Park East, 5th Floor  
6 Los Angeles, CA 90067  
7 Tel: (310) 201-0005  
8 bfreedman@lftcllp.com  
9 smhardy@lftcllp.com  
10 jsunshine@lftcllp.com

11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,  
Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,  
Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO AMENDED NOTICE  
OF DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

Date: June 24-25, 2025

Time: 9:00 a.m.

Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s amended notice of the June 24 to June 25, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The Defendant is no longer available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed. The Notice improperly calls for Defendant’s deposition on two consecutive dates. The burden on Defendant of an endless deposition outweighs the needs of the case.

5. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets. Defendant objects into any inquiry into matters protected by Defendant’s right to privacy, including without limitation Defendant’s sexual history and financial condition. Defendant is entitled to a protective order pursuant to Code of Civil Procedure Section 2025.420 and Civil Code Section 3295 to prevent inquiry into improper subject matter and topics.

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,



1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

7 **III.**

8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010, et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010, et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information ("ESI") without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010, *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

**IV.**

**OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither

1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seeks information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected

1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
12 confidential information protected by the right to privacy under the California or United States  
13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
19 documents to be inspected either by specifically describing each individual item or by reasonably  
20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
28 electronically-stored information ("ESI") without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States



1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
18 the ESI.

19 Defendant objects to this request on the grounds it seek information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant's financial condition in violation of California Civil Code § 3295.



1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
 5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
 13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
 16 confidential information protected by the right to privacy under the California or United States  
 17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
 19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
 21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
 23 documents to be inspected either by specifically describing each individual item or by reasonably  
 24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
 28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*

1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and

1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.

1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully

1 set forth herein.

2 Defendant objects to the request on the grounds that it seeks documents from a remote time  
3 period.

4 Defendant objects to the request on the grounds that it seeks documents and  
5 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
6 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential information protected by the right to privacy under the California or United States  
9 Constitution or applicable statutory or common law.

10 Defendant objects to the request on the grounds that it seeks documents that contain  
11 confidential business or proprietary information protected by trade secret.

12 Defendant objects to the request on the grounds that it seeks documents that are neither  
13 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

14 Defendant objects to the request on the grounds that the request fails to designate the  
15 documents to be inspected either by specifically describing each individual item or by reasonably  
16 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
17 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
18 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

19 Defendant objects to the request on the grounds that to comply with the request would be  
20 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
21 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
22 Defendant.

23 Defendant objects to this request on the grounds it requests Defendant to search  
24 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
25 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
26 the ESI.

27 Defendant objects to this request on the grounds it seek information of Defendant and third  
28 parties that is protected by the right to privacy.

1 Defendant objects to the request on the grounds that it is overly broad and unduly  
2 burdensome.

3 Defendant objects to the request on the grounds that it is vague, ambiguous and  
4 unintelligible.

5 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
6 other discovery propounded by Plaintiff to Defendant in this litigation.

7 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
8 to Defendant's financial condition in violation of California Civil Code § 3295.

9 Defendant objects to the request on the ground that it improperly seeks discovery relating  
10 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
11 Cal.App.4th 475, 480-481.

12 Defendant objects to the request to the extent it seeks the production of records protected  
13 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
14 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

15 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

16 Defendant incorporates the Preliminary Statement and General Objections as though fully  
17 set forth herein.

18 Defendant objects to the request on the grounds that it seeks documents from a remote time  
19 period.

20 Defendant objects to the request on the grounds that it seeks documents and  
21 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
22 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential information protected by the right to privacy under the California or United States  
25 Constitution or applicable statutory or common law.

26 Defendant objects to the request on the grounds that it seeks documents that contain  
27 confidential business or proprietary information protected by trade secret.

28 Defendant objects to the request on the grounds that it seeks documents that are neither



1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seek information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected



1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
 9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
 12 confidential information protected by the right to privacy under the California or United States  
 13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
 15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
 17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
 19 documents to be inspected either by specifically describing each individual item or by reasonably  
 20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
 24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
 28 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States

1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
18 the ESI.

19 Defendant objects to this request on the grounds it seek information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant’s financial condition in violation of California Civil Code § 3295.

1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
 5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
 13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
 16 confidential information protected by the right to privacy under the California or United States  
 17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
 19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
 21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
 23 documents to be inspected either by specifically describing each individual item or by reasonably  
 24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
 28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*

1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and

1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.



1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

1 (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also  
2 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

3 Defendant objects to the request on the grounds that to comply with the request would be  
4 an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court*  
5 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
6 Defendant.

7 Defendant objects to this request on the grounds it requests Defendant to search  
8 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
9 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
10 the ESI.

11 Defendant objects to this request on the grounds it seeks information of Defendant and third  
12 parties that is protected by the right to privacy.

13 Defendant objects to the request on the grounds that it is overly broad and unduly  
14 burdensome.

15 Defendant objects to the request on the grounds that it is vague, ambiguous and  
16 unintelligible.

17 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
18 other discovery propounded by Plaintiff to Defendant in this litigation.

19 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
20 to Defendant’s financial condition in violation of California Civil Code § 3295.

21 Defendant objects to the request on the ground that it improperly seeks discovery relating  
22 to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114  
23 Cal.App.4th 475, 480-481.

24 Defendant objects to the request to the extent it seeks the production of records protected  
25 by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also  
26 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

27 ///

28 ///



1 **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

2 Defendant incorporates the Preliminary Statement and General Objections as though fully  
3 set forth herein.

4 Defendant objects to the request on the grounds that it seeks documents from a remote time  
5 period.

6 Defendant objects to the request on the grounds that it seeks documents and  
7 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
8 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential information protected by the right to privacy under the California or United States  
11 Constitution or applicable statutory or common law.

12 Defendant objects to the request on the grounds that it seeks documents that contain  
13 confidential business or proprietary information protected by trade secret.

14 Defendant objects to the request on the grounds that it seeks documents that are neither  
15 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 Defendant objects to the request on the grounds that the request fails to designate the  
17 documents to be inspected either by specifically describing each individual item or by reasonably  
18 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
19 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
20 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

21 Defendant objects to the request on the grounds that to comply with the request would be  
22 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
23 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
24 Defendant.

25 Defendant objects to this request on the grounds it requests Defendant to search  
26 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
27 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
28 the ESI.

1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

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4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17  
18 DATED: June 20, 2025

LINER FREEDMAN TAITELMAN + COOLEY,  
LLP

19  
20 

21 By: \_\_\_\_\_  
22 Bryan J. Freedman, Esq.  
23 Sean M. Hardy, Esq.  
24 Jason H. Sunshine, Esq.  
25 Attorneys for Defendant  
26 VIN DIESEL (F/K/A MARK SINCLAIR  
27 VINCENT)  
28

**PROOF OF SERVICE**

**STATE OF CALIFORNIA** |  
| ss.  
**COUNTY OF LOS ANGELES** |

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business is EXPRESS NETWORK, LLC, 1605 W. Olympic Blvd, Suite 800, Los Angeles, CA 90015.

On June 20, 2025, I served the foregoing document(s) described:

**OBJECTIONS TO AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017  
*Attorneys for Plaintiff Asta Jonasson*

☒ **By Personal Service.** I personally delivered the above listed documents to the persons at the addresses listed above.

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

Daniel Chavel  
Print Name (Messenger)

[Signature]  
Signature of Declarant (Messenger)

**STATE OF CALIFORNIA**                     ]  
  ]ss.  
**COUNTY OF LOS ANGELES**           ]

On June 20, 2025, I served the foregoing document(s) described:

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof  
enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross, LLP  
650 Town Center Dr, Ste 1700  
Costa Mesa, CA 92626-7025  
*Attorneys for Plaintiff Asta Jonasson*

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

Signature of Declarant (Messenger)

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# **EXHIBIT 11**



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**From:** Matthew T. Hale  
**Sent:** Friday, June 20, 2025 5:12 PM  
**To:** Bryan Freedman; Sean M. Hardy; Jason Sunshine  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha  
**Subject:** Jonasson v. Vin Diesel, et al

Counsel:

We are in receipt of defendant Vin Diesel's objections to Plaintiff's Amended Notice of Deposition and Requests for Production of Documents. For the first time since these dates (June 24 and 25) were provided by his counsel on May 9, 2025, and despite his agreement to appear in Los Angeles, Defendant Vin Diesel now suddenly asserts that he is not available to attend his duly noticed deposition. Please provide, by end of day this coming Monday June 23, 2025, multiple alternative dates for his deposition that fall on or before July 18th. Given the apparent gamesmanship and bad faith nature of this objection, if we do not receive these multiple dates by Monday, we will move forward with a Motion to Compel Vin Diesel's deposition and will take a notice of non-appearance on Tuesday. As to the remainder of Defendant's objections, please see the below:

2. Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."
3. Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. Furthermore, Samantha Vincent already confirmed that Mr. Diesel currently lives in Los Angeles.
4. There is no seven-hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.
5. Defendant asserts that he shouldn't have to attend his deposition because questions *may* be asked that implicate his privacy. Not only is this not a ground to forego attendance altogether, but also there is a protective order in this matter in place to protect truly confidential portions of the deposition.
6. There is absolutely no indication that Plaintiff's office, which has ample security staff and precautions, is inadequate to protect Mr. Diesel's personal safety and privacy.
7. The objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.
8. The objection incorrectly asserts that there is a dispositive motion pending.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)





# **EXHIBIT 12**

---

**From:** Sean M. Hardy <smhardy@lftcllp.com>  
**Sent:** Monday, June 23, 2025 8:09 AM  
**To:** Matthew T. Hale  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha; Bryan Freedman; Jason Sunshine  
**Subject:** [EXT] RE: Jonasson v. Vin Diesel, et al

Counsel,

We respectfully disagree with your position below, and will meet and confer with you on this issue in person today at your office. Thank you.

Sincerely,

Sean M. Hardy

Sean M. Hardy, Esq.  
Partner  
LINER FREEDMAN TAITELMAN + COOLEY, LLP  
1801 Century Park West, 5th Floor  
Los Angeles, California 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Web: [www.ftllp.com](http://www.ftllp.com)

---

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **DECLARATION OF MATTHEW T. HALE IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT VIN DIESEL'S DEPOSITION & REQUEST FOR SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.	Attorneys for Defendants One Race Films, Inc.,
Sean M. Hardy, Esq.	One Race Productions, Inc., Vin Diesel f/k/a
Jason H. Sunshine, Esq.	Mark Sinclair Vincent, and Samantha Vincent

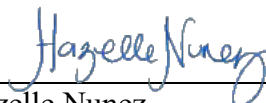
**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Emails: bfreedman@ftllp.com  
smhardy@ftllp.com  
jsunshine@ftllp.com  
vbirtha@ftllp.com  
cpuello@ftllp.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S  
PROPOSED ORDER TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion; Motion to Compel; Declaration of Matthew T. Hale]*

**[PROPOSED] ORDER**

The motion of Plaintiff Asta Jonasson (“Plaintiff”) for an order compelling Defendant Vin Diesel (“Defendant”) to appear for his deposition and granting sanctions, came on for hearing in Department 71 of the above-entitled court on August 11, 2025 at 8:30 a.m.

Having considered the arguments of the parties, the Court hereby **GRANTS** the Motion.

THE COURT HEREBY ORDERS that Defendant shall, within ten (10) days of this order, appear for his deposition at Plaintiff’s office at 601 S. Figueora Street, 30<sup>th</sup> Floor, Los Angeles, California 90017..

THE COURT FURTHER ORDERS that, pursuant to sections 2025.450(a), 2017.010, 2023.030(a), 2023.010(d), and 2023.010(e) of the Code of Civil Procedure, Defendant and its counsel shall, within thirty (30) days of this order, pay to Plaintiff monetary sanctions in the amount of \$7,455.07, which is the amount reasonably incurred by Plaintiff in connection with this motion.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Daniel M. Crowley  
Judge of the Superior Court



# Journal Technologies Court Portal

## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

### Fees

Description	Fee	Qty	Amount
Motion to Compel (name extension)	0.00	1	0.00
TOTAL			\$0.00

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

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**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S PROPOSED ORDER TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.

Sean M. Hardy, Esq.

Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor

Los Angeles, CA 90067

Telephone: (310) 201-0005

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Emails: bfreedman@ftllp.com

smhardy@ftllp.com

jsunshine@ftllp.com

vbirtha@ftllp.com

cpuello@ftllp.com

Attorneys for Defendants One Race Films, Inc.,  
One Race Productions, Inc., Vin Diesel f/k/a  
Mark Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez



BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S NOTICE  
OF MOTION TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND REQUEST FOR  
SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Motion to Compel; Declaration of Matthew T. Hale; [Proposed] Order]*

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on August 11, 2025, at 8:30 a.m., in Department 71 of  
 3 Stanley Mosk Courthouse at 111 N. Hill Street, Los Angeles, California 90012, or as soon thereafter  
 4 as the matter can be heard, plaintiff Asta Jonasson will and hereby does move the Court for an order  
 5 compelling Defendant Vin Diesel to appear for his deposition and for Defendant Vin Diesel and his  
 6 counsel, Liner Freedman Taitelman + Cooley to pay sanctions in the amount of \$7,455.07, which is  
 7 the amount reasonably incurred in connection with these proceedings.

8 Plaintiff moves to compel Defendant Vin Diesel's deposition after a pattern of evasion and  
 9 obstruction spanning over a year. Despite multiple notices, good faith efforts to accommodate his  
 10 schedule, and his counsel's express confirmation of availability for June 24-25, 2025, Defendant  
 11 served last-minute objections just four days before his scheduled deposition containing recycled,  
 12 meritless arguments. When Plaintiff's counsel attempted to meet and confer, Defendant's counsel  
 13 engaged in shocking misconduct, including profanity, threats of malicious prosecution, and physical  
 14 intimidation, while refusing to provide any legitimate explanation for Defendant's sudden  
 15 unavailability. Defendant's objections lack merit as they misinterpret applicable statutes, seek to  
 16 prevent discovery on topics central to Plaintiff's claims, and attempt to delay proceedings until after  
 17 trial through frivolous procedural maneuvers.

18 This motion will be based on the Code of Civil Procedure sections 2025.450(a), 2017.010,  
 19 2023.030(a), 2023.010(d), and 2023.010(e), the following Memorandum of Points and Authorities,  
 20 Declaration of Matthew T. Hale, and exhibits filed along with these papers, and other evidence to  
 21 be presented at the hearing on this motion.

22  
 23 DATED: June 26, 2025

GREENBERG GROSS LLP

24  
 25 By: /s/ Matthew T. Hale

26 Brian L. Williams

27 Jemma E. Dunn

Matthew T. Hale

28 Attorneys for Plaintiff Asta Jonasson



# Journal Technologies Court Portal

## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

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TOTAL			\$0.00

### Payment

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Payment Date: n/a	

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**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S NOTICE OF MOTION TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND REQUEST FOR SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.

Sean M. Hardy, Esq.

Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor

Los Angeles, CA 90067

Telephone: (310) 201-0005

Facsimile: (310) 201-0045

Emails: bfreedman@ftllp.com

smhardy@ftllp.com

jsunshine@ftllp.com

vbirtha@ftllp.com

cpuello@ftllp.com

Attorneys for Defendants One Race Films, Inc.,  
One Race Productions, Inc., Vin Diesel f/k/a  
Mark Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez

# **EXHIBIT 13**

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S  
MOTION TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND REQUEST FOR  
SANCTIONS; MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT THEREOF**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion to Compel; Declaration of Matthew T. Hale; [Proposed] Order]*

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

This case arises from allegations that Defendant Vin Diesel sexually assaulted Plaintiff Asta Jonasson in September 2010 while she was working as his assistant during the production of the film “Fast Five,” and then terminated her employment the following day in retaliation for resisting the assault incident. Plaintiff remained silent for years due to fear of industry ostracization, immigration concerns as a green card holder, and restrictive non-disclosure agreements imposed by Defendants. Empowered by recent legislative changes, Plaintiff filed this lawsuit in December 2023 seeking redress for the sexual assault and wrongful termination.

Plaintiff now moves to compel Defendant Vin Diesel’s deposition after a pattern of evasion and obstruction spanning over a year. Despite multiple notices, good faith efforts to accommodate his schedule, and his counsel’s express confirmation of availability for June 24-25, 2025, Defendant served last-minute objections containing recycled, meritless arguments just four days before his scheduled deposition. When Plaintiff’s counsel attempted to meet and confer, Defendant’s counsel responded with shocking misconduct, including profanity, threats of malicious prosecution, and physical intimidation, while refusing to provide any legitimate explanation for Defendant’s sudden unavailability. Defendant’s objections lack merit as they misinterpret applicable statutes, seek to prevent discovery on topics central to Plaintiff’s claims, and attempt to delay proceedings until after trial through frivolous procedural maneuvers.

Plaintiff respectfully requests this Court compel Defendant Vin Diesel to appear for deposition within ten days and impose monetary sanctions of \$7,455.07 against Defendant and his counsel for their willful abuse of the discovery process, pattern of evasion, and unmeritorious objections that have unnecessarily delayed essential discovery in this matter.

**II. STATEMENT OF THE CASE**

**A. Defendant Vin Diesel’s Testimony is Essential to the Prosecution of Plaintiff’s Matter.**

In September 2010, Plaintiff Asta Jonasson was hired by Defendants as an assistant working directly for Defendant Vin Diesel during the production of “Fast Five.” (Compl., p. 2, ¶ 1.) Shortly

1 after beginning her employment, on or about September 10, 2010, Plaintiff alleges that Defendant  
2 Diesel sexually assaulted her in his hotel suite at the St. Regis Hotel in Atlanta, Georgia. (Compl.,  
3 p. 10, ¶¶ 29-30.) The following day, on or about September 11, 2010, Plaintiff was terminated from  
4 her position when Samantha Vincent, President of One Race and Defendant Diesel’s sister, called  
5 Plaintiff and stated that One Race no longer needed “any extra help.” (Compl., p. 11, ¶ 32.)

6 For years following the alleged incident, Plaintiff remained silent about the sexual assault.  
7 She was afraid to speak out against a high-profile actor due to concerns about being ostracized from  
8 the industry jeopardizing her potential future citizenship while she was a green card holder. (Compl.,  
9 p. 3, ¶ 7.) Additionally, One Race required all employees to sign non-disclosure agreements, further  
10 limiting Plaintiff’s ability to discuss matters related to her employment and Defendant Diesel.  
11 (Compl., p. 3, ¶ 7.)

12 Recently empowered by the #MeToo and Time’s Up movements, and with the protection of  
13 the Speak Out Act and the revival of her claims under California Assembly Bill 2777 (AB 2777),  
14 Plaintiff is now seeking legal relief for the alleged sexual assault and subsequent termination of her  
15 employment. (Compl., p. 4, ¶ 7.)

16 This lawsuit was filed on December 21, 2023, pursuant to Code of Civil Procedure § 340.16,  
17 as amended by Assembly Bill 2777.

18 **B. Defendant Vin Diesel Has Repeatedly Evaded Deposition Despite Multiple**  
19 **Notices and Good Faith Efforts To Accommodate His Schedule.**

20 Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024.  
21 (See Declaration of Matthew T. Hale (“Hale Decl.”), ¶ 2, Exh. 1.) On May 1, 2024, Defendant  
22 served his objection to the notice of deposition, indicating in part that neither he nor his counsel  
23 were available on that date. (Hale Decl., ¶ 3, Exh. 2.)

24 On April 7, 2025, Plaintiff re-noticed Mr. Diesel’s deposition for April 29, 2025. (Hale Decl.,  
25 ¶ 4, Exh. 3.) and requested that Defendant’s counsel provide alternative deposition dates if Mr.  
26 Diesel or his attorneys were not available on that date. (Hale Decl., ¶¶ 4-5, Exhs. 3-4.) More than  
27 two weeks later, on April 24, 2025, Defendant’s counsel belatedly responded by serving objections  
28 to the deposition notice via overnight mail without providing any alternative deposition dates. (Hale

1 Decl., ¶ 6, Exh. 5.)

2       Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the  
3 objections to Mr. Diesel’s deposition notice. (Hale Decl., ¶ 7, Exh. 6.) This letter addressed Mr.  
4 Diesel’s objections in detail, each of which was unmeritorious. Following discussion on this letter,  
5 counsel for Defendant Vin Diesel confirmed that Mr. Diesel would appear for his deposition in  
6 person on June 24 and June 25, 2025. (Hale Decl., ¶ 8, Exh. 7.) On May 13, 2025, Plaintiff’s counsel  
7 emailed counsel for Defendant to confirm that the deposition would be held at Plaintiff’s office in  
8 downtown Los Angeles and to request that they inform Plaintiff’s counsel immediately if this  
9 location was an issue. (Hale Decl., ¶ 9, Exh. 8.) That same date, May 13, 2025, Plaintiff served the  
10 notice of deposition of Defendant Vin Diesel to be conducted at the Los Angeles office of Plaintiff’s  
11 counsel on June 24 and June 25, 2025. (Hale Decl., ¶ 10, Exh. 9.)

12       **C. Defendant Vin Diesel Served Nearly Identical Objections Just Four Days Before**  
13       **His Scheduled Deposition Despite Previously Confirming His Availability.**

14       On June 20, 2025—four days before the deposition date that Defendant’s counsel had agreed  
15 upon more than one month earlier—counsel for Defendant Vin Diesel served objections to  
16 Plaintiff’s deposition notice via personal service. (Hale Decl., ¶ 11, Exh. 10.) This objection  
17 document closely resembled the prior objection document from April 2025, including five of the  
18 same eight objections. (See Hale Decl. ¶ 6, Exh. 5.) The only three new objections related to Vin  
19 Diesel’s purported unavailability on the date his counsel had selected, the scope of the deposition,  
20 and Defendant’s claim that the deposition location at the Los Angeles office of Plaintiff’s counsel  
21 could not “protect Defendant’s personal safety and privacy” (*Ibid.*) Plaintiff’s counsel had  
22 previously conducted in-person depositions in this matter at Plaintiff counsel’s Los Angeles office  
23 on May 28, 2025 and June 19, 2025. (Hale Decl., ¶ 12.)

24       That same day, June 20, 2025, Plaintiff’s counsel responded via email, meeting and  
25 conferring regarding each objection and requesting alternative dates before the fact discovery cutoff  
26 (July 18, 2025), given Vin Diesel’s asserted unavailability. (Hale Decl., ¶ 13, Exh. 11.)

27       **D. Defendant’s Counsel Engaged In Obstructionist Tactics, Including Physical**  
28       **Threats And Profanity, While Refusing To Provide Any Legitimate Reason For**

1                   **Vin Diesel's Last-Minute Unavailability.**

2           Plaintiff's counsel was scheduled to take the in-person deposition of third party witness  
3 Valentino Morales on June 23, 2025. (Hale Decl., ¶ 14.) The morning of this deposition, counsel for  
4 Defendant Vin Diesel asserted that they disagreed with Plaintiff counsel's position regarding Vin  
5 Diesel's objections to his duly noticed deposition and would meet and confer in person, later that  
6 day, on June 23, 2025. (Hale Decl., ¶ 15, Exh. 12.)

7           Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third party  
8 deponent on June 23, 2025. (Hale Decl., ¶ 16.) Prior to the deposition, Plaintiff's counsel Matthew  
9 Hale requested to meet and confer about the objections to the deposition of Vin Diesel in a separate  
10 room. (*Ibid.*) Mr. Hale and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly  
11 unavailable for his deposition. (*Ibid.*) Mr. Hale requested to know why Mr. Diesel was suddenly  
12 unavailable, and Mr. Hardy refused to provide a reason. (*Ibid.*)

13           During this back and forth, Mr. Freedman entered the room. (Hale Decl., ¶ 17.) Mr. Hale  
14 again requested to know why Mr. Diesel was unavailable to determine if this was a true emergency  
15 or a simple failure to appear for his deposition, for which availability had been cleared over a month  
16 prior, as it would be important for the purposes of any motion to compel that may need to be filed.  
17 (*Ibid.*) Counsel for Defendant continued to refuse to provide any explanation. (*Ibid.*) Mr. Freedman  
18 interjected and told Mr. Hale to just file his motion and called Mr. Hale, a "moron" and cursed while  
19 doing so. (*Ibid.*) Mr. Hale began to write down the language on note paper, specifically stating that  
20 he would be including these insults in his declaration to any Motion and requesting to have a  
21 professional and substantive meet and confer. (*Ibid.*) Mr. Freedman then threatened Mr. Hale with  
22 malicious prosecution and called him a "piece of shit." (*Ibid.*) At no time did Mr. Hale exchange  
23 any insult with Mr. Freedman, raise his voice, or provoke any physical contact. (*Ibid.*) Shortly  
24 thereafter, Mr. Freedman got up from his chair, rushed to stand directly in front of Mr. Hale mere  
25 inches away from him, causing Mr. Freedman's face to be directly in front of that of Mr. Hale.  
26 (*Ibid.*) Mr. Freedman then called Mr. Hale a "pussy" and swung his fist at Mr. Hale's face, stopping  
27 directly in front of his face without making contact. (*Ibid.*) Shocked, Mr. Hale nonetheless remained  
28 composed and attempted to address Mr. Hardy behind Mr. Freedman, in hopes that counsel could

1 get the meet and confer discussion back on track. (*Ibid.*) Shortly thereafter, Mr. Freedman left the  
 2 room, and Mr. Hale and Mr. Hardy conducted the meet and confer session, both then and after the  
 3 deposition concluded later that day. (*Ibid.*)

4 Given Mr. Diesel's asserted objection regarding the lack of security and privacy at Plaintiff's  
 5 counsel's office, Mr. Hale requested to know what was deficient about their security and/or privacy.  
 6 (Hale Decl., ¶ 18.) Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed  
 7 to be able to quickly leave the deposition for his security, including in relation to death threats,  
 8 without having to go down thirty floors and obtain his vehicle from an underground parking lot.  
 9 (*Ibid.*) Mr. Hardy also asserted that Mr. Diesel would need his personal security with him. (*Ibid.*)

10 Mr. Hale then offered to conduct the next day's deposition at defense counsel's office. (Hale  
 11 Decl., ¶ 19.) Mr. Hardy again asserted that Mr. Diesel was not in the city. (*Ibid.*) Mr. Hale asked  
 12 when Mr. Diesel left the city and where he was, but Mr. Hardy would not provide that information.  
 13 (*Ibid.*) Mr. Hardy then *for the first time* laid out several conditions for a rescheduled deposition of  
 14 Vin Diesel: (1) that the deposition be conducted for no more than seven hours; (2) that a protective  
 15 order be in place to protect Defendant's financial, medical, and sexual privacy; (3) that the  
 16 deposition take place at defense counsel's office or remotely; and (4) that the deposition only occur  
 17 following the hearing on Defendant's just-filed Motion for Summary Judgment/Adjudication, set  
 18 for October 7, 2025, nearly two months after the current trial date of August 18, 2025. (*Ibid.*)

19 At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties further  
 20 met and conferred, at an Informal Discovery Conference, or in any other venue. (Hale Decl., ¶ 20.)

#### 21 **E. Defendant's Filing of a Motion for Protective Order**

22 On the same date, June 23, 2025, Defendant Vin Diesel filed a Motion for Protective Order  
 23 on the same subset of four (4) grounds listed immediately above. As will be argued below, these  
 24 grounds are unmeritorious.

### 25 **III. LEGAL STANDARD**

26 Code of Civ. Proc., § 2025.450(a) provides as follows:

27 If, after service of a deposition notice, a party to the action or an officer, director,  
 28 managing agent, or employee of a party, or a person designated by an

organization that is a party under Section 2025.230, without having served a valid objection under Section 2025.410, fails to appear for examination, or to proceed with it, or to produce for inspection any document or tangible thing described in the deposition notice, the party giving the notice may move for an order compelling the deponent's attendance and testimony, and the production for inspection of any document or tangible thing described in the deposition notice.

#### IV. ARGUMENT

##### A. Defendant Vin Diesel's Objections to his Notice of Deposition are Invalid and Unmeritorious.

###### 1. Defendant Vin Diesel's Asserted Unavailability

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel, for the first time since his counsel provided his availability for an in-person deposition on May 9, 2025, asserted that he was not available for his deposition. (Hale Decl., ¶ 11, Exh. 10, p. 1) Neither in writing nor verbally through his counsel did Defendant communicate any true emergency to explain his availability. In fact, Mr. Diesel's counsel indicated that he was not even "in the city." Mr. Diesel's counsel declined to provide any further detail. When Plaintiff's counsel offered to conduct the deposition at defense counsel's office, as requested by Mr. Diesel, defense counsel again asserted Mr. Diesel was not "in the city."

Furthermore, "unavailability" is not an adequate objection to a duly-served deposition notice. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure section 2025.210 *et seq.*

###### 2. In-Person Attendance

In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that he cannot be required to attend his deposition in-person, pursuant to *Code of Civ. Proc.*, § 2025.310(a). (Hale Decl., ¶ 11, Exh. 10, p. 1.) However, as pointed out to counsel in previous meet and confer discussions regarding an identical objection to a prior notice of deposition of Mr. Diesel, this is a misreading of that code section.

CCP § 2025.310(a) states as follows: "At the election of the deponent or the deposing party,



1 the deposition officer may attend the deposition at a different location than the deponent via remote  
 2 means. A deponent is not required to be physically present with the deposition officer when being  
 3 sworn in at the time of the deposition.” Thus, the code section permits the deposition officer, i.e.,  
 4 the court reporter, to attend the deposition via remote means. No reference is made to the deponent’s  
 5 ability to elect a remote appearance.

6 CCP § 2025.310(b), which Mr. Diesel did not cite in his objection, states as follows: “Subject  
 7 to Section 2025.420, any party or attorney of record may, but is not required to, be physically present  
 8 at the deposition at the location of the deponent. If a party or attorney of record elects to be physically  
 9 present at the location of the deponent, all physically present participants in the deposition shall  
 10 comply with local health and safety ordinances, rules, and orders.” This code section similarly does  
 11 not permit Mr. Diesel to elect a remote appearance; it merely allows Mr. Diesel, or his attorney of  
 12 record, to be physically present at the location of another deponent. Of course, this supports  
 13 Plaintiff’s position, as Plaintiff and her attorney of record may be physically present at the deposition  
 14 of the deponent in this scenario: Vin Diesel.

### 15 **3. Location of Deposition**

16 In his objection to Plaintiff’s Notice of Deposition, Mr. Diesel asserts that he should not  
 17 have to attend a deposition “to the extent the deposition is noticed for a location more than 150 miles  
 18 from Defendant’s residence.” (Hale Decl., ¶ 11, Exh. 10, p. 1.) Mr. Diesel failed to even  
 19 straightforwardly assert that he in fact lives more than 150 miles from Plaintiff’s counsel’s office in  
 20 downtown Los Angeles, where the deposition is to take place. Mr. Diesel’s objection is so vague  
 21 and uncertain as to operate as a waiver of any such objection.

22 Furthermore, Samantha Vincent – Mr. Diesel’s sister – and Valentino Morales – Mr. Diesel’s  
 23 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
 24 Los Angeles, California. (Hale Decl., ¶ 21.) Defendant’s suggestion to hold the deposition at defense  
 25 counsel’s office in Century City also confirms the convenience of Los Angeles as a location for Mr.  
 26 Diesel’s deposition.

27 Finally, Plaintiff’s counsel repeatedly requested confirmation on this topic from defense  
 28 counsel but was not provided with any. As recently as May 13, 2025, Plaintiff’s counsel requested

1 to confirm that the in-person location of Vin Diesel’s June 24 and 25 deposition was to be Los  
 2 Angeles, specifically Plaintiff’s counsel’s Los Angeles office. (Hale Decl., ¶ 9, Exh 8.) Of course,  
 3 this is Plaintiff’s choice to begin with, but Plaintiff extended this question as a courtesy, which  
 4 received no response from defense counsel.

#### 5 **4. Time Limit**

6 Defendant Diesel also objected that his deposition should be limited to seven-hours under  
 7 CCP § 2025.290. (Hale Decl., ¶ 11, Exh. 10, p. 1.) Pursuant to CCP § 2025.290(b)(4), depositions  
 8 in employment matters are excepted from the default seven-hour limit. While Plaintiff’s FEHA  
 9 claims have indeed been dismissed, multiple employment claims still remain, including Retaliation  
 10 in Violation of Labor Code, §§ 98.6, 1102.5 and Wrongful Termination in Violation of Public  
 11 Policy.

12 Further, the notice of deposition does not assume any particular total time to be on the record.  
 13 A full day of deposition rarely equates to seven hours on the record.

#### 14 **5. Questions Implicating Privacy**

15 “[A]ny party may obtain discovery regarding any matter, not privileged, that is relevant to  
 16 the subject matter involved in the pending action or to the determination of any motion made in that  
 17 action, if the matter either is itself admissible in evidence or appears reasonably calculated to lead  
 18 to the discovery of admissible evidence.” (*Code Civ. Proc.*, § 2017.010.) “‘Relevant’ evidence is  
 19 evidence ‘having any tendency in reason to prove or disprove any disputed fact that is of  
 20 consequence to the determination of the action.’” (*D.Z. v. Los Angeles Unified School Dist.* (2019)  
 21 35 Cal.App.5th 210, 229.) “The party asserting a privacy right must establish a legally protected  
 22 privacy interest, an objectively reasonable expectation of privacy in the given circumstances, and a  
 23 threatened intrusion that is serious.” (*Williams v. Sup. Ct.* (2017) 3 Cal.5th 531, 552.) If the court  
 24 finds a privacy interest, the court must balance the privacy concerns against the need for the  
 25 information. (*Id.* at p. 552.)

26 Defendant Vin Diesel asserts that he should not have to attend his deposition because  
 27 questions *may* be asked that implicate his privacy, including his sexual history and financial  
 28 condition. (Hale Decl., ¶ 11, Exh. 10, p. 1.)

1 First, as to Defendant's financial condition, Plaintiff is already not permitted to seek pretrial  
2 discovery on this subject. (Civ. Code, § 3295(a)(2).) As such, a protective order is altogether  
3 unnecessary. On the contrary, Plaintiff must request an order permitting such discovery to obtain it  
4 pretrial. Plaintiff has not and does not plan on doing so. Defendant cannot be permitted to delay his  
5 deposition by simply listing subjects to which Plaintiff never had the intention or ability to inquire  
6 about.

7 Second, as to Mr. Diesel's "sexual history," it is unclear as to what Defendant is referring,  
8 given the ambiguity of the phrase. As asserted in Mr. Diesel's summary judgment motion, set to be  
9 heard after trial, Plaintiff relies on *Code of Civ. Proc.*, § 340.16 to revive her claims based on  
10 wrongful conduct in 2010. With regard to claims revived by *Code of Civ. Proc.*, § 340.16(e),  
11 Plaintiff must allege the following:

12 (A) The plaintiff was sexually assaulted.

13 (B) One or more entities are legally responsible for damages arising out of the  
14 sexual assault.

15 (C) The entity or entities, including, but not limited to, their officers, directors,  
16 representatives, employees, or agents, engaged in a cover up or attempted a cover  
17 up of a previous instance or allegations of sexual assault by an alleged perpetrator  
18 of such abuse.

19 As such, questions regarding previous instances of sexual assault by Mr. Diesel are  
20 reasonably calculated to lead to the discovery of admissible evidence. Now, Mr. Diesel seeks to  
21 prevent Plaintiff from even *seeking* essential discovery, while at the same time attempting to dismiss  
22 her claims for lack of that same sought-for evidence. That said, Plaintiff is not interested in Mr.  
23 Diesel's "sexual history" wholesale. An order preventing all investigation into anything sexual with  
24 regard to Vin Diesel would necessarily prevent Plaintiff from asking questions directed toward Mr.  
25 Diesel about accusations of sexual assault or abuse previously committed by him. A stipulated  
26 protective order ("SPO") in this matter has been in place since July 25, 2024. Any particular  
27 questions that Defendant or his counsel believe run afield are better addressed on a question-by-  
28 question basis, at which time counsel may simply instruct their client not to answer. All testimony

1 will have the protection of the parties' protective order, so long as Defendant labels it as confidential,  
2 subject to the procedure in the parties' SPO to de-designate as confidential any testimony. In this  
3 scenario, a specialized protective order is a blunt tool that would prevent Plaintiff from seeking  
4 essential discovery.

5 In his recently filed Motion for Protective Order, Mr. Diesel adds multiple other types of  
6 privacy to the list, including medical and psychotherapeutic. Plaintiff has no interest in discovery  
7 on these topics, and Defendant has provided no examples of what it may be concerned about Plaintiff  
8 inquiring into. Again, Defendant cannot be permitted to delay his deposition by simply listing  
9 subjects to which Plaintiff never had the intention to inquire about and asking the Court to hear that  
10 Motion months after the parties' August 2025 trial date. Rather, the appropriate remedy is to appear  
11 for a properly noticed deposition (which was previously agreed to by defense counsel), and object  
12 on the record. This permits the Court to make specific findings as to specific questions rather than  
13 asking the Court to make premature blanket rulings on questions that have not yet been posed.

14 Finally, Defendant also adds "employment history" to the list of private topics that may not  
15 be inquired about. Defendant fails to define precisely what is meant by the ambiguous phrase.  
16 Plaintiff was employed by Defendant and his entities, so to the extent "employment history" refers  
17 to Vin Diesel's employment with Defendants One Race Films, Inc. or One Race Productions, Inc.,  
18 such topics are squarely discoverable. Other than this, Plaintiff has little interest in probing into  
19 Mr. Diesel's career path, which is already publicly known.

## 20 **6. Safety**

21 In his objection to Plaintiff's Notice of Deposition, Mr. Diesel asserts that Plaintiff's office  
22 is "inadequate to protect Defendant's personal safety and privacy." (Hale Decl., ¶ 11, Exh. 10, p. 2.)  
23 As is known by Defendants' counsel, Plaintiff's counsel's office is located in the PwC building on  
24 7<sup>th</sup> and Figueroa, which is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. (Hale Decl. ¶  
25 22.) Like many buildings downtown, it has multiple 24/7 dedicated security personnel. (*Ibid.*)  
26 Entrance is restricted per floor, and visitors may only access a particular floor if they have been  
27 added to a security list and been ushered to an appropriate elevator by security. (*Ibid.*) During a meet  
28 and confer session with Defense counsel, Sean Hardy explained that the concern was more about

1 the quickness with which Mr. Diesel could descend from the 30<sup>th</sup> floor and retrieve his vehicle from  
2 the building's underground parking. (Hale Decl. ¶ 18.) This is not a reasonable or rational basis for  
3 failing to attend a deposition. Further, no explanation was provided with relation to the building's  
4 inability to protect Defendant's privacy, so this is still a mystery.

5 During the in-person meet and confer, Plaintiff's counsel offered as a compromise to conduct  
6 the deposition at the office of defense counsel. (Hale Decl. ¶ 19.) Defense counsel stated that  
7 nonetheless, Mr. Diesel was "not in the city" and so would not be attending. (*Ibid.*)

8 For purposes of security, Plaintiff also suggests the deposition be held at the courthouse  
9 where there is ample security to alleviate Mr. Diesel's concerns.

#### 10 **7. Vague Procedural Deficiencies**

11 Mr. Diesel also objected "to the extent [the deposition notice] fails to comply with the  
12 requirements on Code of Civil Procedure section 2025.210, *et seq.*" (Hale Decl., ¶ 11, Exh. 10, p.  
13 2.) This objection lacks any specificity as to what requirements the notice fails to comply with, and  
14 no additional detail has been provided by counsel. This objection should be disregarded due to its  
15 vagueness and ambiguity.

#### 16 **8. Pending Dispositive Motion**

17 Defendant's final objection asserts good cause exists to stay the deposition pending  
18 Defendant's Motion for Summary Judgment/Adjudication ("MSJ"), which is scheduled to be heard  
19 on October 7, 2025, nearly two months past the parties' August 18, 2025 trial date. (Hale Decl., ¶  
20 11, Exh. 10, p. 2.) The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and  
21 *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal*  
22 and *Silver* are both cases where a plaintiff had yet to get past the pleadings stage, and each court  
23 stated that the plaintiff had to state at least one cause of action before discovery or depositions would  
24 be permitted. Of course, this matter is past the pleadings stage, is deep into fact discovery, and  
25 testimony sought at the deposition of Vin Diesel is squarely relevant to Plaintiff's preparation for  
26 Trial. Further, the MSJ should never be heard because it was filed late, and so should not be used as  
27 a sword to delay discovery and trial itself.

1           **B. Plaintiff's Counsel Adequately Met and Conferred Prior to Filing this Motion.**

2           Pursuant to Code of Civ. Proc., § 2025.450(b)(2), a motion to compel a deposition should  
3 be accompanied by a meet and confer declaration under section 2016.040 or, when the deponent  
4 fails to attend the deposition and produce the documents, electronically stored information, or things  
5 described in the deposition notice, by a declaration stating that the petitioner has contacted the  
6 deponent to inquire about the nonappearance. Plaintiff here does both. Plaintiff's counsel Matthew  
7 Hale attempted a reasonable and good faith resolution of each issued presented by this motion by  
8 meeting and conferring with opposing counsel on multiple occasions and contacted the deponent's  
9 counsel to inquire about the intended nonappearance. (Hale Decl. ¶ 13-20, Exh. 11-12.)

10           **C. Monetary Sanctions Are Appropriate Due to Defendant's Misuse of the**  
11 **Discovery Process.**

12           California Code of Civil Procedure section 2023.030(a) provides that "[t]he court may  
13 impose a monetary sanction ordering that one engaging in the misuse of the discovery process."  
14 California Code of Civil Procedure section 2023.010(d) provides that "[f]ailing to respond or to  
15 submit to an authorized method of discovery" constitutes misuse of the discovery process.  
16 California Code of Civil Procedure section 2023.010(e) provides that "making, without substantial  
17 justification, an unmeritorious objection to discovery" also constitutes misuse of the discovery  
18 process.

19           Here, sanctions against Mr. Diesel and his counsel, Liner Freedman Taitelman + Cooley, are  
20 warranted pursuant to the aforementioned code sections because Defendant has failed to appear for  
21 his properly noticed deposition. Further, Defendant's unmeritorious objections and counsel's  
22 improper conduct constitute a misuse of the discovery process and failure to respond or to submit  
23 to an authorized method of discovery.

24           Code of Civil Procedure section 2025.450(g)(1) provides:

25           If a motion under subdivision (a) is granted, *the court shall impose a monetary*  
26 *sanction* under Chapter 7 (commencing with Section 2023.010) in favor of the  
27 party who noticed the deposition and against the deponent or the party with whom  
28 the deponent is affiliated, unless the court finds that the one subject to the sanction

1 acted with substantial justification or that other circumstances make the  
 2 imposition of the sanction unjust. (Emphasis added.)

3 Defendants' conduct is a willful abuse of the discovery process for which Defendant and his  
 4 counsel should be sanctioned. Defendant has failed to appear at his duly noticed deposition, at a  
 5 date and location agreed to by the parties. Under the statutes enumerated above, plaintiff requests  
 6 sanctions in the amount of \$7,455.07 for costs and attorneys' fees. (Hale Decl. ¶ 29.)<sup>1</sup>

7 **V. CONCLUSION**

8 Accordingly, Plaintiff Asta Jonasson requests that this Court issue an order directing  
 9 Defendant to appear for deposition within the next ten (10) days, directing Defendant and his  
 10 counsel, Liner Freedman Taitelman + Cooley, to pay sanctions to plaintiff in the amount of  
 11 \$7,455.07 for this willful discovery violation.

12  
 13 DATED: June 26, 2025

GREENBERG GROSS LLP

14  
 15 By: /s/ Matthew T. Hale

16 Brian L. Williams

17 Jemma E. Dunn

18 Matthew T. Hale

19 Attorneys for Plaintiff Asta Jonasson  
 20  
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27 <sup>1</sup> To the extent it solves any of Defendant's concerns, it may be prudent to appoint a discovery  
 28 referee at Mr. Freedman's expense to ensure (1) professional conduct at further in person depositions  
 and meet and confers and (2) to make decisions regarding the appropriateness of the subject matter  
 of the questions during the deposition in real time.

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S MOTION TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.	Attorneys for Defendants One Race Films, Inc.,
Sean M. Hardy, Esq.	One Race Productions, Inc., Vin Diesel f/k/a
Jason H. Sunshine, Esq.	Mark Sinclair Vincent, and Samantha Vincent

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor

Los Angeles, CA 90067

Telephone: (310) 201-0005

Facsimile: (310) 201-0045

Emails: bfreedman@ftllp.com

smhardy@ftllp.com

jsunshine@ftllp.com

vbirtha@ftllp.com

cpuello@ftllp.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez



BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**DECLARATION OF MATTHEW T. HALE IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT VIN DIESEL'S DEPOSITION & REQUEST FOR SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion; Motion to Compel; [Proposed] Order]*

**DECLARATION OF MATTHEW T. HALE**

I, Matthew T. Hale, declare as follows:

1. I am an attorney at law, duly authorized to practice law in the State of California. I am an attorney with the law firm of Greenberg Gross LLP, counsel of record for plaintiff Asta Jonasson (“Plaintiff” or “Jonasson”) in this case. The facts stated herein are within my personal knowledge and if called upon to testify, I can truthfully and competently do so as to all matters herein

2. Plaintiff Asta Jonasson first noticed Defendant Vin Diesel’s deposition for May 7, 2024. A true and correct copy of that deposition notice is attached hereto as **Exhibit 1**.

3. On May 1, 2024, Defendant Vin Diesel served his objection to the notice of deposition, indicating in part that neither he nor his counsel were available on that date. A true and correct copy of that objection document is attached hereto as **Exhibit 2**.

4. On April 7, 2025, Plaintiff again noticed Mr. Diesel’s deposition, this time for April 29, 2025. A true and correct copy of that deposition notice is attached hereto as **Exhibit 3**.

5. Plaintiff accompanied the notice of deposition with a letter requesting alternative dates if April 29, 2025 did not work for Mr. Diesel or his attorneys. A true and correct copy of that letter is attached hereto as **Exhibit 4**.

6. No response was received to that letter until Mr. Diesel’s objections to the deposition notice were served via overnight mail on April 24, 2025. A true and correct copy of that objection document is attached hereto as **Exhibit 5**.

7. Thereafter, Plaintiff sent a letter to Mr. Diesel’s counsel to meet and confer regarding the objections to Mr. Diesel’s deposition notice. A true and correct copy of that letter is attached hereto as **Exhibit 6**.

8. Following discussion on this letter, counsel for Defendant Vin Diesel confirmed that he would appear for his deposition in person on June 24 and June 25. A true and correct copy of the confirming email from Jason Sunshine is attached hereto as **Exhibit 7**.

9. On May 13, 2025, Plaintiff’s counsel emailed counsel for Defendant confirming that the deposition would be held at Plaintiff’s office downtown Los Angeles and to inform Plaintiff’s

1 counsel immediately if this was an issue. A true and correct copy of the confirming email from  
2 Matthew Hale is attached hereto as **Exhibit 8**.

3 10. That same date, May 13, 2025, Plaintiff served the notice of deposition of Defendant  
4 Vin Diesel to be conducted at Plaintiff counsel's Los Angeles office for June 24 and June 25., 2025  
5 A true and correct copy of that deposition notice is attached hereto as **Exhibit 9**.

6 11. On June 20, 2025, counsel for Defendant Vin Diesel served via personal service its  
7 objections to Plaintiff's deposition notice, served on May 13, 2025. A true and correct copy of that  
8 objection document is attached hereto as **Exhibit 10**.

9 12. Plaintiff's counsel had previously conducted in-person depositions in this matter at  
10 Plaintiff counsel's Los Angeles office on May 28, 2025 and June 19, 2025.

11 13. That same day, June 20, 2025, Plaintiff's counsel responded via email, meeting and  
12 conferring regarding each objection and requesting alternative dates before the fact discovery cutoff  
13 (July 18, 2025), given Vin Diesel's asserted unavailability. A true and correct copy of that email is  
14 attached hereto as **Exhibit 11**.

15 14. Plaintiff's counsel was scheduled to take the in-person deposition of third party  
16 witness Valentino Morales on June 23, 2025.

17 15. The morning of this deposition, counsel for Defendant Vin Diesel asserted that they  
18 disagreed with Plaintiff counsel's position regarding Vin Diesel's objections to his duly noticed  
19 deposition and would meet and confer in person later that day, on June 23, 2025. A true and correct  
20 copy of that email from Sean Hardy is attached hereto as **Exhibit 12**.

21 16. Counsel for Defendants, Sean Hardy and Bryan Freedman, appeared with the third  
22 party deponent on June 23, 2025. Prior to the deposition, Plaintiff's counsel Matthew Hale requested  
23 to meet and confer about the objections to the deposition of Vin Diesel in a separate room. Mr. Hale  
24 and Mr. Hardy began to discuss the assertion that Mr. Diesel was suddenly unavailable for his  
25 deposition. Mr. Hale requested to know why Mr. Diesel was suddenly unavailable, and Mr. Hardy  
26 refused to provide a reason.

27 17. During this back and forth, Mr. Freedman entered the room. Mr. Hale again requested  
28 to know why Mr. Diesel was unavailable to determine if this was a true emergency or a simple

1 failure to appear for his deposition, for which availability had been cleared over a month prior, as it  
2 would be important for the purposes of any Motion to compel that may need to be filed. Counsel for  
3 Defendant continued to refuse to provide any explanation. Mr. Freedman interjected and told Mr.  
4 Hale to just file his motion and called Mr. Hale, a “moron” and cursed while doing so. Mr. Hale  
5 began to write down the language on note paper, specifically stating that he would be including  
6 these insults in his declaration to any motion and requesting to have a professional and substantive  
7 meet and confer. Mr. Freedman then threatened Mr. Hale with malicious prosecution and called  
8 him a “piece of shit.” At no time did Mr. Hale exchange any insult with Mr. Freedman, raise his  
9 voice, or provoke any physical contact. Shortly thereafter, Mr. Freedman got up from his chair,  
10 rushed to stand directly in front of Mr. Hale, mere inches away from him, causing Mr. Freedman’s  
11 face to be directly in front of that of Mr. Hale. Mr. Freedman then called Mr. Hale a “pussy” and  
12 swung his fist at Mr. Hale’s face, stopping directly in front of his face, without making contact.  
13 Shocked, Mr. Hale nonetheless remained composed and attempted to address Mr. Hardy behind Mr.  
14 Freedman, in hopes that counsel could get the meet and confer discussion back on track. At some  
15 point shortly thereafter, Mr. Freedman left the room, and Mr. Hale and Mr. Hardy conducted the  
16 meet and confer session, both then and after the deposition concluded later that day.

17 18. Given Mr. Diesel’s asserted objection regarding the lack of security and privacy at  
18 Plaintiff’s counsel’s office, Mr. Hale requested to know what was deficient about their security  
19 and/or privacy. Mr. Hardy indicated that Mr. Diesel had a medical condition and that he needed to  
20 be able to quickly leave the deposition for his security, including in relation to death threats, without  
21 having to go down thirty floors and obtain his vehicle from an underground parking lot. Mr. Hardy  
22 also asserted that Mr. Diesel would need his personal security with him.

23 19. Mr. Hale then offered to conduct the next day’s deposition at defense counsel’s  
24 office. Mr. Hardy again asserted that Mr. Diesel was not in the city. Mr. Hale asked when Mr. Diesel  
25 left the city and where he was, but Mr. Hardy would not provide that information. Mr. Hardy laid  
26 out several conditions for a rescheduled deposition of Vin Diesel: (1) that the deposition be  
27 conducted for no more than seven hours; (2) that a protective order be in place to protect Defendant’s  
28 financial, medical, and sexual privacy; (3) that the deposition take place at defense counsel’s office

1 or remotely; and (4) that the deposition only occur following the hearing on Defendant's just-filed  
2 Motion for Summary Judgment/Adjudication, set for October 7, 2025, nearly two months after the  
3 current trial date of August 18, 2025.

4 20. At no time did Mr. Hale agree to forego filing a Motion to Compel while the parties  
5 further met and conferred, at an Informal Discovery Conference, or in any other venue.

6 21. Samantha Vincent – Mr. Diesel's sister – and Valentino Morales – Mr. Diesel's  
7 security and close friend – already confirmed at their depositions that Mr. Diesel currently lives in  
8 Los Angeles, California.

9 22. Plaintiff's counsel's office is located in the PwC building on 7<sup>th</sup> and Figueroa, which  
10 is home to Seyfarth Shaw and PricewaterhouseCoopers LLP. Like many buildings downtown, it has  
11 multiple 24/7 dedicated security personnel. Entrance is restricted per floor, and visitors may only  
12 access a particular floor if they have been added to a security list and been ushered to an appropriate  
13 elevator by security.

14 23. I have been practicing law since 2015. I primarily litigate wrongful termination of  
15 employment and discrimination cases in both state and federal court on behalf of plaintiffs, including  
16 cases based upon violations of the Fair Employment and Housing Act and the California Labor  
17 Code.

18 24. I am a graduate of the University of California, Los Angeles, School of Law and of  
19 Harvard University.

20 25. In January of 2023, my colleagues and I tried Galvan v. United Parcel Service, et al.  
21 (LASC Case No. BC703891), which resulted in a \$5.4 million verdict.

22 26. I have been confirmed legal fees at an hourly rate of \$850.00 by Judge Lipner of  
23 Department 72.

24 27. Throughout my practice as an attorney on plaintiff's side, I have become familiar  
25 with customary billing rates for attorneys of my experience level and title. I understand that my  
26 hourly rate as an associate attorney of a plaintiff's law firm is at least comparable, if not below, the  
27 hourly rates of other attorneys in similar situations.

28 28. I am familiar with the proper procedure for calculating hourly bills. I understand

1 which tasks are billable and which are not. All of the time that I spent on this motion was necessary  
2 to prepare it properly and diligently.

3 29. I have primarily handled the discovery issues in this action. I have spent  
4 approximately one hour meeting and conferring with Defendant's counsel regarding the motion,  
5 including drafting and revising correspondence and participating in conferences regarding the  
6 same. I also spent more than 5 hours preparing and revising all briefing in connection with the  
7 instant Motion to Compel, including in preparing this declaration and preparing and revising the  
8 brief, notice, and proposed order (6 hours X \$850.00 = \$5,100.00). I anticipate that it will take me  
9 an additional 2.5 hours to review Defendant's opposition, prepare a reply brief in support of the  
10 motion, and prepare for and attend oral argument on this motion (2.5 hours X \$850.00 = \$2,125.00).  
11 I was also required to cancel my hotel reservation due to the cancellation of Defendant's deposition,  
12 with a fee in the amount of \$230.07. As such, Plaintiff has incurred fees and costs in the amount of  
13 \$5,330.07 and is likely to incur costs in the amount of \$2,125.00, for a total of \$7,455.07.

14 I declare, under penalty of perjury under the laws of the State of California, that the foregoing  
15 is true and correct.

16 Date: June 26, 2025.

17 

18 Matthew T. Hale  
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# Journal Technologies Court Portal

## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

### Fees

Description	Fee	Qty	Amount
Motion to Compel (name extension)	0.00	1	0.00
TOTAL			\$0.00

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

Print Receipt

Reserve Another Hearing

View My Reservations





# **EXHIBIT 1**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
CLAIRE-LISE Y. KUTLAY, State Bar No. 307080  
*CKutlay@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT)**

Date: May 7, 2024  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: Not Yet Set


1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of Defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on May 7,  
6 2024, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 DATED: February 26, 2024

GREENBERG GROSS LLP

11 By:

  
\_\_\_\_\_  
12 Brian L. Williams  
13 Claire-Lise Y. Kutlay  
14 Matthew T. Hale  
15 Attorneys for Plaintiff Asta Jonasson  
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# **EXHIBIT 2**

FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
Tel: (310) 201-0005  
bfreedman@ftllp.com  
smhardy@ftllp.com  
jsunshine@ftllp.com

Attorneys for Defendant  
VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M. Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT)**

**Date: May 7, 2024**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the May 7, 2024 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310, that any deposition proceed via remote video, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets without the entry of a mutually-acceptable protective order.

5. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

6. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

1           7. Defendant objects to the Notice to the extent it fails to comply with the  
2 requirements on Code of Civil Procedure section 2025.210, *et seq.*

3  
4 DATED: May 1, 2024

FREEDMAN TAITELMAN + COOLEY, LLP

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7 \_\_\_\_\_  
8 Bryan J. Freedman, Esq.  
9 Sean M. Hardy, Esq.  
10 Jason H. Sunshine, Esq.  
11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR  
13 VINCENT)  
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**PROOF OF SERVICE**

1  
2 **STATE OF CALIFORNIA**            |  
  | **ss.**  
3 **COUNTY OF LOS ANGELES**       |

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18,  
5 and not a party to the within action. My business address is FREEDMAN TAITELMAN +  
COOLEY, LLP, 1801 Century Park West, 5th Floor, Los Angeles, CA 90067.

6 On **May 1, 2024**, I served the following document(s) entitled **OBJECTIONS TO**  
7 **NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR**  
**VINCENT)** on the interested parties in this action as follows:

8 Brian L. Williams  
9 Claire-Lise Y. Kutlay  
10 Matthew T. Hale  
11 GREENBERG GROSS LLP  
12 601 S. Figueroa Street, 30<sup>th</sup> Floor  
13 Los Angeles, California 90017  
14 Tel. (213) 334-7000  
15 Fax. (213) 334-7001  
16 [BWilliams@GGTrialLaw.com](mailto:BWilliams@GGTrialLaw.com)  
[CKutlay@GGTrialLaw.com](mailto:CKutlay@GGTrialLaw.com)  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)  
[PHorlacher@GGTrialLaw.com](mailto:PHorlacher@GGTrialLaw.com)  
[DVultaggio@GGTrialLaw.com](mailto:DVultaggio@GGTrialLaw.com)  
[CRose@GGTrialLaw.com](mailto:CRose@GGTrialLaw.com)  
[MSance@GGTrialLaw.com](mailto:MSance@GGTrialLaw.com)

17 *Attorneys for Plaintiff Asta Jonasson*

19 <input checked="" type="checkbox"/>	<b>By Overnight Delivery.</b> I deposited a sealed envelope containing a true and correct copy of the documents listed above for overnight delivery via Federal Express.
21 <input checked="" type="checkbox"/>	<b>By E-Mail or Electronic Transmission.</b> I caused the documents to be sent to the persons at the email address listed below in a PDF file, and the transmission appeared to be successful.

23  
24 I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

25 Executed on **May 1, 2024**, at Los Angeles, California.

27 /s/ Vaneta D. Birtha  
28 Vaneta D. Birtha



# **EXHIBIT 3**

BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**NOTICE OF DEPOSITION TO  
DEFENDANT VIN DIESEL (F/K/A MARK  
SINCLAIR VINCENT) AND REQUESTS  
FOR PRODUCTION OF DOCUMENTS**

Date: April 29, 2025  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on April 29,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters

1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.



1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///


1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: April 7, 2025

GREENBERG GROSS LLP

5  
6 By:



7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

# **EXHIBIT 4**





**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

April 7, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

Enclosed please find notices of deposition for defendants Vin Diesel and Samantha Vincent and witnesses Valentino Morales and Thyrale Thai. If any of the noticed dates are not workable for the deponents' schedules, please let us know as soon as possible, and propose alternative dates that fall before the end of May 2025. Furthermore, counsel has previously objected that defendants Vin Diesel and Samantha Vincent *may* not reside within 150 miles of downtown Los Angeles. If these defendants do not reside within 150 miles of downtown Los Angeles, please notify our office of these defendants' city of residence, and we will coordinate a convenient location.

We are happy to accommodate reasonable scheduling conflicts, but considering the upcoming trial date, we will be completing these depositions by the end of May 2025.

Very truly yours,

Matthew T. Hale

Encls.

# **EXHIBIT 5**

1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
Bryan J. Freedman, Esq. (SBN 151990)  
2 Sean M. Hardy, Esq. (SBN 266466)  
Jason Sunshine (SBN 336062)  
3 1801 Century Park East, 5th Floor  
Los Angeles, CA 90067  
4 Tel: (310) 201-0005  
bfreedman@lftcllp.com  
5 smhardy@lftcllp.com  
jsunshine@lftcllp.com

6 Attorneys for Defendant  
7 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES**

10  
11 ASTA JONASSON, an individual,

12 Plaintiff,

13 vs.

14 VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
15 individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
16 FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,

17 Defendants.  
18  
19  
20  
21  
22  
23  
24  
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26  
27  
28

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO NOTICE OF  
DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

**Date: April 29, 2025**

**Time: 9:00 a.m.**

**Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017**

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s notice of the April 29, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The deposition was unilaterally set without any consideration for either the deponent or counsel’s availability, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(1). Consideration has not been given in scheduling this deposition because Plaintiff did not clear the dates and time with counsel, and neither the deponent nor his counsel of record are available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. The deposition was unilaterally set prior to the initially-noticed deposition of Plaintiff Asta Jonasson, without the agreement of counsel, in violation of Los Angeles Superior Court, Local Rule Appendix 3.A(e)(3).

5. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed.

6. Defendant objects to the Notice to the extent it fails to comply with the requirements on Code of Civil Procedure section 2025.210, *et seq.*

7. Defendant objects to the **14** requests for production of documents in connection with the Notice. Plaintiff served the requests for production of documents on April 7, 2025 by electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*, which contemplates 32 days when responding to document requests served by electronic service. See Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## II.

### **INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION**

The following responses are made solely for the purpose of this action. Any document or thing supplied in response to any request is subject to all objections as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on any ground that would require the exclusion of any document or thing, or portion thereof, if such document or thing were offered in evidence, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,

1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

### 7 III.

#### 8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010. et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010. et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).



20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010. *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

#### IV.

#### **OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

##### **OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

1 Defendant objects to the request on the grounds that it seeks documents that are neither  
2 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

3 Defendant objects to the request on the grounds that the request fails to designate the  
4 documents to be inspected either by specifically describing each individual item or by reasonably  
5 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
6 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
7 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

8 Defendant objects to the request on the grounds that to comply with the request would be  
9 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
10 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
11 Defendant.

12 Defendant objects to this request on the grounds it requests Defendant to search  
13 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
14 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
15 the ESI.

16 Defendant objects to this request on the grounds it seeks information of Defendant and third  
17 parties that is protected by the right to privacy.

18 Defendant objects to the request on the grounds that it is overly broad and unduly  
19 burdensome.

20 Defendant objects to the request on the grounds that it is vague, ambiguous and  
21 unintelligible.

22 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
23 other discovery propounded by Plaintiff to Defendant in this litigation.

24 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
25 to Defendant’s financial condition in violation of California Civil Code § 3295.

26 Defendant objects to the request on the ground that it improperly seeks discovery relating  
27 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
28 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search

electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

### **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential information protected by the right to privacy under the California or United States  
2 Constitution or applicable statutory or common law.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential business or proprietary information protected by trade secret.

5 Defendant objects to the request on the grounds that it seeks documents that are neither  
6 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

7 Defendant objects to the request on the grounds that the request fails to designate the  
8 documents to be inspected either by specifically describing each individual item or by reasonably  
9 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

10 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
11 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

12 Defendant objects to the request on the grounds that to comply with the request would be  
13 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
14 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
15 Defendant.

16 Defendant objects to this request on the grounds it requests Defendant to search  
17 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
18 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
19 the ESI.

20 Defendant objects to this request on the grounds it seek information of Defendant and third  
21 parties that is protected by the right to privacy.

22 Defendant objects to the request on the grounds that it is overly broad and unduly  
23 burdensome.

24 Defendant objects to the request on the grounds that it is vague, ambiguous and  
25 unintelligible.

26 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
27 other discovery propounded by Plaintiff to Defendant in this litigation.

28 Defendant objects to the request on the grounds that it improperly seeks discovery relating

1 to Defendant's financial condition in violation of California Civil Code § 3295.

2 Defendant objects to the request on the ground that it improperly seeks discovery relating  
3 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
4 Cal.App.4th 475, 480-481.

5 Defendant objects to the request to the extent it seeks the production of records protected  
6 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
7 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

8 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

9 Defendant incorporates the Preliminary Statement and General Objections as though fully  
10 set forth herein.

11 Defendant objects to the request on the grounds that it seeks documents from a remote time  
12 period.

13 Defendant objects to the request on the grounds that it seeks documents and  
14 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
15 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential information protected by the right to privacy under the California or United States  
18 Constitution or applicable statutory or common law.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential business or proprietary information protected by trade secret.

21 Defendant objects to the request on the grounds that it seeks documents that are neither  
22 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

23 Defendant objects to the request on the grounds that the request fails to designate the  
24 documents to be inspected either by specifically describing each individual item or by reasonably  
25 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
26 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
27 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

28 Defendant objects to the request on the grounds that to comply with the request would be

1 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
2 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
3 Defendant.

4 Defendant objects to this request on the grounds it requests Defendant to search  
5 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
6 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
7 the ESI.

8 Defendant objects to this request on the grounds it seeks information of Defendant and third  
9 parties that is protected by the right to privacy.

10 Defendant objects to the request on the grounds that it is overly broad and unduly  
11 burdensome.

12 Defendant objects to the request on the grounds that it is vague, ambiguous and  
13 unintelligible.

14 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
15 other discovery propounded by Plaintiff to Defendant in this litigation.

16 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
17 to Defendant’s financial condition in violation of California Civil Code § 3295.

18 Defendant objects to the request on the ground that it improperly seeks discovery relating  
19 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
20 Cal.App.4th 475, 480-481.

21 Defendant objects to the request to the extent it seeks the production of records protected  
22 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
23 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

24 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
28 period.



1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
23 the ESI.

24 Defendant objects to this request on the grounds it seeks information of Defendant and third  
25 parties that is protected by the right to privacy.

26 Defendant objects to the request on the grounds that it is overly broad and unduly  
27 burdensome.

28 Defendant objects to the request on the grounds that it is vague, ambiguous and



1 unintelligible.

2 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
3 other discovery propounded by Plaintiff to Defendant in this litigation.

4 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
5 to Defendant's financial condition in violation of California Civil Code § 3295.

6 Defendant objects to the request on the ground that it improperly seeks discovery relating  
7 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
8 Cal.App.4th 475, 480-481.

9 Defendant objects to the request to the extent it seeks the production of records protected  
10 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
11 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

12 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

13 Defendant incorporates the Preliminary Statement and General Objections as though fully  
14 set forth herein.

15 Defendant objects to the request on the grounds that it seeks documents from a remote time  
16 period.

17 Defendant objects to the request on the grounds that it seeks documents and  
18 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
19 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential information protected by the right to privacy under the California or United States  
22 Constitution or applicable statutory or common law.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential business or proprietary information protected by trade secret.

25 Defendant objects to the request on the grounds that it seeks documents that are neither  
26 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

27 Defendant objects to the request on the grounds that the request fails to designate the  
28 documents to be inspected either by specifically describing each individual item or by reasonably

1 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
2 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
3 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

4 Defendant objects to the request on the grounds that to comply with the request would be  
5 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
6 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
7 Defendant.

8 Defendant objects to this request on the grounds it requests Defendant to search  
9 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
10 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
11 the ESI.

12 Defendant objects to this request on the grounds it seeks information of Defendant and third  
13 parties that is protected by the right to privacy.

14 Defendant objects to the request on the grounds that it is overly broad and unduly  
15 burdensome.

16 Defendant objects to the request on the grounds that it is vague, ambiguous and  
17 unintelligible.

18 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
19 other discovery propounded by Plaintiff to Defendant in this litigation.

20 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
21 to Defendant’s financial condition in violation of California Civil Code § 3295.

22 Defendant objects to the request on the ground that it improperly seeks discovery relating  
23 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
24 Cal.App.4th 475, 480-481.

25 Defendant objects to the request to the extent it seeks the production of records protected  
26 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
27 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the request on the grounds that the request fails to designate the documents to be inspected either by specifically describing each individual item or by reasonably particularizing each category of item as required by *Code of Civil Procedure* section 2031.030. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

3 Defendant objects to the request on the grounds that it is overly broad and unduly  
4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

18 Defendant incorporates the Preliminary Statement and General Objections as though fully  
19 set forth herein.

20 Defendant objects to the request on the grounds that it seeks documents from a remote time  
21 period.

22 Defendant objects to the request on the grounds that it seeks documents and  
23 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
24 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

25 Defendant objects to the request on the grounds that it seeks documents that contain  
26 confidential information protected by the right to privacy under the California or United States  
27 Constitution or applicable statutory or common law.

28 Defendant objects to the request on the grounds that it seeks documents that contain

1 confidential business or proprietary information protected by trade secret.

2 Defendant objects to the request on the grounds that it seeks documents that are neither  
3 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

4 Defendant objects to the request on the grounds that the request fails to designate the  
5 documents to be inspected either by specifically describing each individual item or by reasonably  
6 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

7 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
8 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

9 Defendant objects to the request on the grounds that to comply with the request would be  
10 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
11 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
12 Defendant.

13 Defendant objects to this request on the grounds it requests Defendant to search  
14 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
15 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
16 the ESI.

17 Defendant objects to this request on the grounds it seek information of Defendant and third  
18 parties that is protected by the right to privacy.

19 Defendant objects to the request on the grounds that it is overly broad and unduly  
20 burdensome.

21 Defendant objects to the request on the grounds that it is vague, ambiguous and  
22 unintelligible.

23 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
24 other discovery propounded by Plaintiff to Defendant in this litigation.

25 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
26 to Defendant’s financial condition in violation of California Civil Code § 3295.

27 Defendant objects to the request on the ground that it improperly seeks discovery relating  
28 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114

1 Cal.App.4th 475, 480-481.

2 Defendant objects to the request to the extent it seeks the production of records protected  
3 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
4 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

5 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

6 Defendant incorporates the Preliminary Statement and General Objections as though fully  
7 set forth herein.

8 Defendant objects to the request on the grounds that it seeks documents from a remote time  
9 period.

10 Defendant objects to the request on the grounds that it seeks documents and  
11 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
12 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

13 Defendant objects to the request on the grounds that it seeks documents that contain  
14 confidential information protected by the right to privacy under the California or United States  
15 Constitution or applicable statutory or common law.

16 Defendant objects to the request on the grounds that it seeks documents that contain  
17 confidential business or proprietary information protected by trade secret.

18 Defendant objects to the request on the grounds that it seeks documents that are neither  
19 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

20 Defendant objects to the request on the grounds that the request fails to designate the  
21 documents to be inspected either by specifically describing each individual item or by reasonably  
22 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
23 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
24 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

25 Defendant objects to the request on the grounds that to comply with the request would be  
26 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
27 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
28 Defendant.

1 Defendant objects to this request on the grounds it requests Defendant to search  
2 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
3 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
4 the ESI.

5 Defendant objects to this request on the grounds it seeks information of Defendant and third  
6 parties that is protected by the right to privacy.

7 Defendant objects to the request on the grounds that it is overly broad and unduly  
8 burdensome.

9 Defendant objects to the request on the grounds that it is vague, ambiguous and  
10 unintelligible.

11 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
12 other discovery propounded by Plaintiff to Defendant in this litigation.

13 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
14 to Defendant’s financial condition in violation of California Civil Code § 3295.

15 Defendant objects to the request on the ground that it improperly seeks discovery relating  
16 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
17 Cal.App.4th 475, 480-481.

18 Defendant objects to the request to the extent it seeks the production of records protected  
19 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
20 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

21 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

22 Defendant incorporates the Preliminary Statement and General Objections as though fully  
23 set forth herein.

24 Defendant objects to the request on the grounds that it seeks documents from a remote time  
25 period.

26 Defendant objects to the request on the grounds that it seeks documents and  
27 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
28 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.



1 Defendant objects to the request on the grounds that it seeks documents that contain  
2 confidential information protected by the right to privacy under the California or United States  
3 Constitution or applicable statutory or common law.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential business or proprietary information protected by trade secret.

6 Defendant objects to the request on the grounds that it seeks documents that are neither  
7 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

8 Defendant objects to the request on the grounds that the request fails to designate the  
9 documents to be inspected either by specifically describing each individual item or by reasonably  
10 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
11 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
12 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

13 Defendant objects to the request on the grounds that to comply with the request would be  
14 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
15 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
16 Defendant.

17 Defendant objects to this request on the grounds it requests Defendant to search  
18 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
19 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
20 the ESI.

21 Defendant objects to this request on the grounds it seeks information of Defendant and third  
22 parties that is protected by the right to privacy.

23 Defendant objects to the request on the grounds that it is overly broad and unduly  
24 burdensome.

25 Defendant objects to the request on the grounds that it is vague, ambiguous and  
26 unintelligible.

27 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
28 other discovery propounded by Plaintiff to Defendant in this litigation.



1 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
2 to Defendant's financial condition in violation of California Civil Code § 3295.

3 Defendant objects to the request on the ground that it improperly seeks discovery relating  
4 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
5 Cal.App.4th 475, 480-481.

6 Defendant objects to the request to the extent it seeks the production of records protected  
7 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
8 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

9 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

10 Defendant incorporates the Preliminary Statement and General Objections as though fully  
11 set forth herein.

12 Defendant objects to the request on the grounds that it seeks documents from a remote time  
13 period.

14 Defendant objects to the request on the grounds that it seeks documents and  
15 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
16 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

17 Defendant objects to the request on the grounds that it seeks documents that contain  
18 confidential information protected by the right to privacy under the California or United States  
19 Constitution or applicable statutory or common law.

20 Defendant objects to the request on the grounds that it seeks documents that contain  
21 confidential business or proprietary information protected by trade secret.

22 Defendant objects to the request on the grounds that it seeks documents that are neither  
23 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

24 Defendant objects to the request on the grounds that the request fails to designate the  
25 documents to be inspected either by specifically describing each individual item or by reasonably  
26 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
27 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
28 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

1 Defendant objects to the request on the grounds that to comply with the request would be  
 2 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 3 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 4 Defendant.

5 Defendant objects to this request on the grounds it requests Defendant to search  
 6 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
 7 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
 8 the ESI.

9 Defendant objects to this request on the grounds it seek information of Defendant and third  
 10 parties that is protected by the right to privacy.

11 Defendant objects to the request on the grounds that it is overly broad and unduly  
 12 burdensome.

13 Defendant objects to the request on the grounds that it is vague, ambiguous and  
 14 unintelligible.

15 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
 16 other discovery propounded by Plaintiff to Defendant in this litigation.

17 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
 18 to Defendant’s financial condition in violation of California Civil Code § 3295.

19 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 20 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
 21 Cal.App.4th 475, 480-481.

22 Defendant objects to the request to the extent it seeks the production of records protected  
 23 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 24 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

**OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

25 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 26 set forth herein.

27 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 28 period.

1 Defendant objects to the request on the grounds that it seeks documents and  
2 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
3 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

4 Defendant objects to the request on the grounds that it seeks documents that contain  
5 confidential information protected by the right to privacy under the California or United States  
6 Constitution or applicable statutory or common law.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential business or proprietary information protected by trade secret.

9 Defendant objects to the request on the grounds that it seeks documents that are neither  
10 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

11 Defendant objects to the request on the grounds that the request fails to designate the  
12 documents to be inspected either by specifically describing each individual item or by reasonably  
13 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
14 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
15 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

16 Defendant objects to the request on the grounds that to comply with the request would be  
17 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
18 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
19 Defendant.

20 Defendant objects to this request on the grounds it requests Defendant to search  
21 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
22 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
the ESI.

23 Defendant objects to this request on the grounds it seeks information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.

1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

1 Defendant objects to the request on the grounds that it seeks documents from a remote time  
2 period.

3 Defendant objects to the request on the grounds that it seeks documents and  
4 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
5 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential information protected by the right to privacy under the California or United States  
8 Constitution or applicable statutory or common law.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential business or proprietary information protected by trade secret.

11 Defendant objects to the request on the grounds that it seeks documents that are neither  
12 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

13 Defendant objects to the request on the grounds that the request fails to designate the  
14 documents to be inspected either by specifically describing each individual item or by reasonably  
15 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
16 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
17 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

18 Defendant objects to the request on the grounds that to comply with the request would be  
19 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
20 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
21 Defendant.

22 Defendant objects to this request on the grounds it requests Defendant to search  
23 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
24 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
the ESI.

25 Defendant objects to this request on the grounds it seeks information of Defendant and third  
26 parties that is protected by the right to privacy.

27 Defendant objects to the request on the grounds that it is overly broad and unduly  
28 burdensome.

1 Defendant objects to the request on the grounds that it is vague, ambiguous and  
2 unintelligible.

3 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
4 other discovery propounded by Plaintiff to Defendant in this litigation.


5 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
6 to Defendant's financial condition in violation of California Civil Code § 3295.

7 Defendant objects to the request on the ground that it improperly seeks discovery relating  
8 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
9 Cal.App.4th 475, 480-481.

10 Defendant objects to the request to the extent it seeks the production of records protected  
11 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
12 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

13  
14 DATED: April 24, 2025

LINER FREEDMAN TAITELMAN + COOLEY, LLP

15  
16   
17 Bryan J. Freedman, Esq.  
18 Sean M. Hardy, Esq.  
19 Jason H. Sunshine, Esq.  
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21 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)  
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28



**PROOF OF SERVICE**

1  
2 **STATE OF CALIFORNIA** |  
3 **COUNTY OF LOS ANGELES** | ss.  
4

5 I am employed in the County of Los Angeles, State of California. I am over the age of  
6 18 and not a party to the within action; my business address is 1801 Century Park West, 5<sup>th</sup> Floor,  
7 Los Angeles, California 90067.

8 On **April 24, 2025**, I served the foregoing document(s) entitled **OBJECTIONS TO  
9 NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR  
10 VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested  
11 parties in this action as follows:

12 Brian L. Williams 13 Claire-Lise Y. Kutlay 14 Matthew T. Hale 15 Philip A. Horlacher 16 Kathie Lee 17 Crystal M. Rose 18 Maria Sance 19 GREENBERG GROSS LLP 20 601 S. Figueroa Street, 30 <sup>th</sup> Floor 21 Los Angeles, California 90017 22 Tel. (213) 334-7000 23 Fax. (213) 334-7001 24 25 <i>Attorneys for Plaintiff Asta Jonasson</i>	<a href="mailto:BWilliams@GGTrialLaw.com">BWilliams@GGTrialLaw.com</a> <a href="mailto:CKutlay@GGTrialLaw.com">CKutlay@GGTrialLaw.com</a> <a href="mailto:MHale@GGTrialLaw.com">MHale@GGTrialLaw.com</a> <a href="mailto:PHorlacher@GGTrialLaw.com">PHorlacher@GGTrialLaw.com</a> <a href="mailto:KLee@GGTrialLaw.com">KLee@GGTrialLaw.com</a> <a href="mailto:CRose@GGTrialLaw.com">CRose@GGTrialLaw.com</a> <a href="mailto:MSance@GGTrialLaw.com">MSance@GGTrialLaw.com</a>
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26 ☒ **By Overnight Mail:** by placing the document(s) listed above in a sealed Federal Express  
27 envelope and affixing a pre-paid air bill and causing the envelope to be delivered to a Federal  
28 Express agent for next business day delivery to the address(es) listed below.

I declare under penalty of perjury under the laws of the State of California that the above is  
true and correct. Executed on **April 24, 2025**, at Los Angeles, California.

/s/ Vaneta D. Birtha  
Vaneta D. Birtha



# **EXHIBIT 6**



**Greenberg Gross LLP**

Matthew T. Hale  
Direct Dial: (213) 334-7060  
MHale@GGTrialLaw.com

May 1, 2025

**VIA EMAIL ONLY**

Bryan J. Freedman  
Sean M. Hardy  
Jason Sunshine  
FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5th Floor  
Los Angeles, CA 90067  
[bfreedman@ftllp.com](mailto:bfreedman@ftllp.com)  
[smhardy@ftllp.com](mailto:smhardy@ftllp.com)  
[jsunshine@ftllp.com](mailto:jsunshine@ftllp.com)

**Re: *Asta Jonasson v. One Race Films, Inc., et al.***

Counsel:

I write to meet and confer regarding Vin Diesel's general objections to Plaintiff's deposition subpoena.

First, Mr. Diesel's objection based on scheduling is not well-taken. Plaintiff is not required to "clear dates" before noticing a deposition. A deposition subpoena is valid if it complies with the timing and service requirements of Code of Civil Procedure sections 2025.210 and 2020.220. Plaintiff already initiated a good faith effort to coordinate the deposition, and your office failed to respond in any way until making the instant objection.

Second, Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."

Third, Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. My April 7, 2025 letter even inquired about this previously stated objection, but Mr. Diesel chose to reuse this equivocal objection nonetheless.



May 1, 2025  
Page 2

Fourth, Ms. Jonasson's deposition has not been noticed for any future date, no less in the "reasonably near future," as required by the related LASC Local Rule. Defendant has chosen to not re-notice Plaintiff's deposition since early 2024.

Fifth, there is no seven hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.

Sixth, the objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.

Seventh, this objection does not relate to Mr. Diesel sitting for his deposition but rather to the documents demanded in the notice. This dispute will be addressed elsewhere.

Eighth, the objection merely asserts good cause exists to stay the deposition pending the MJOP. The cases cited, *Silver v. City of Los Angeles* (1966) 245 Cal. App. 2d 673 and *Terminal Equip. Co. v. City* (1990) 221 Cal. App. 3d 234 do not stand for this proposition. *Terminal* and *Silver* are both cases where a plaintiff has yet to get past the pleadings stage and the court stated that the plaintiff had to state at least one cause of action before discovery or deposition would be permitted. Of course, this matter is past the pleadings stage, and the MJOP does not even relate to each and every cause of action. Furthermore, the Defendants would need to file a Motion to Stay Discovery in order to stay fact discovery, and they have not done so.

Please let us know when you are available for a call on these topics tomorrow or early next week. Thereafter, we will need to seek relief from the Court.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Matthew T. Hale'.

Matthew T. Hale

# **EXHIBIT 7**

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**From:** Jason Sunshine <[jsunshine@lftcllp.com](mailto:jsunshine@lftcllp.com)>  
**Sent:** Friday, May 9, 2025 5:18 PM  
**To:** Matthew T. Hale  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** [EXT] RE: Jonasson v. Diesel, et al.

Matt:

Further to our meet and confer discussion on Monday, we can confirm that Samantha Vincent is available for deposition on May 29. Non-party Valentino Morales is available for deposition on June 3. Vin Diesel is available in-person on June 24 and June 25. Please confirm those dates, so we can lock them in. We are in the process of obtaining availability from non-party Thyrale Thai and should be in a position to offer the same to you next week. Additionally, per our prior request and discussion, please provide Ms. Jonasson's availability for deposition during this period. Finally, per our prior proposal and discussion on Monday, we reiterate that we have confirmed that Department 71 accepts stipulations and proposed orders to continue trial dates, and that we are amenable to doing so given your protestations regarding timing constraints.

Thanks,  
Jason

Jason H. Sunshine, Esq.  
LINER FREEDMAN TAITELMAN + COOLEY LLP  
1801 Century Park West, 5<sup>th</sup> Floor  
Los Angeles, California 90067  
Tel: (310) 201-0005  
Direct: (310) 201-4285  
Cell: (917) 841-8716  
Fax: (310) 201-0045  
Web: [www.lftcllp.com](http://www.lftcllp.com)

*Please note that LFTC's domain name has changed from [fllp.com](http://fllp.com) to [lftcllp.com](http://lftcllp.com). Emails sent from this domain are not spam.*

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and, as such, is privileged and confidential. If you have received this communication in error, please notify us immediately by e-mail and delete the original message.

# **EXHIBIT 8**

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**From:** Matthew T. Hale  
**Sent:** Tuesday, May 13, 2025 10:12 AM  
**To:** Jason Sunshine  
**Cc:** Sean M. Hardy; Bryan Freedman; Joanna Rivera; Miles Cooley; Vaneta Birtha; Jemma E. Dunn; Brian Williams  
**Subject:** RE: Jonasson v. Diesel, et al.

Hi Jason,

Yes, I'll presume the in-person location is Los Angeles, but please let us know immediately if this is not correct. In the interim, we'll notice them for our LA office. I can confirm the dates for Valentino Morales (6/3) and Vin Diesel (6/24-25). We will notice these depositions shortly.

We will need additional dates for Samantha Vincent's deposition as 5/29 does not work for us. Please provide those and dates for Ms. Thai as soon as possible. Thank you.

We are not amenable to continuing the trial.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)



Los Angeles | Orange County | Las Vegas | New York

# EXHIBIT 9



BRIAN L. WILLIAMS, State Bar No. 227948  
*BWilliams@GGTrialLaw.com*  
JEMMA E. DUNN, State Bar No. 258454  
*JDunn@GGTrialLaw.com*  
MATTHEW T. HALE, State Bar No. 303826  
*MHale@GGTrialLaw.com*  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**AMENDED NOTICE OF DEPOSITION  
TO DEFENDANT VIN DIESEL (F/K/A  
MARK SINCLAIR VINCENT) AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

Date: June 24-25, 2025  
Time: 9:00 a.m.  
Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, CA 90017

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Code of Civil Procedure Section 2025.010 *et*  
3 *seq.*, Plaintiff Asta Jonasson will take the deposition of defendant Vin Diesel (f/k/a Mark Sinclair  
4 Vincent). The deposition will take place at the office of Greenberg Gross LLP, 601 S. Figueroa  
5 Street, 30<sup>th</sup> Floor, Los Angeles, California 90017. The deposition shall commence on June 24-25,  
6 2025, at 9:00 a.m. and shall continue from day to day thereafter until completed. The deposition  
7 will be recorded using audio or video technology and will be conducted using the stenographic  
8 method.

9 PLEASE TAKE FURTHER NOTICE THAT, pursuant to Code of Civil Procedure  
10 Section 2034.415, the Deponent is directed to produce the documents and things set forth below  
11 no later than three business days before the deposition.

12 **DEFINITIONS**

13 Words in ALL CAPITAL LETTERS in these definitions, instructions, and Requests are  
14 defined as follows:

15 1. The term “DOCUMENT(S)” means all documents and electronically stored  
16 information—including but not limited to all emails, text messages, writings, drawings, graphs,  
17 charts, photographs, video and sound recordings, images, worksheets, and other data and data  
18 compilations—stored in any medium from which information can be obtained either directly or, if  
19 necessary, after translation into a reasonably usable form, and includes COMMUNICATIONS.

20 2. The term “COMMUNICATION(S)” means and refers to all correspondence,  
21 discussions, conversations, interviews, telephone calls, emails, instant messages, voice mail  
22 messages, negotiations, notices, agreements, understandings, meetings, recordings, audiotapes,  
23 videotapes, transcripts, facsimiles, telegrams, charts, spreadsheets, visual images, presentations,  
24 and all other transmissions of information, thoughts, documents, electronically stored information,  
25 or ideas between two or more PERSONS.

26 3. The terms “YOU” and “YOUR” means and refers to defendant Vin Diesel.

27 4. The terms “any” and “all” are interchangeable and shall be construed disjunctively,  
28 conjunctively, or both, as necessary to bring within the scope of this discovery request all matters

1 which might otherwise be construed to be outside of its scope.

2 5. The term “each” means “each and every.”

3 6. The term “including” means “including, but not limited to.”

4 7. The use of the singular form of any word includes the plural and vice versa.

5 **INSTRUCTIONS**

6 1. The original of each responsive item (or a legible copy if the original is not within  
7 YOUR possession, custody, or control) shall be identified and produced at the above-stated date,  
8 time, and place unless complete and legible copies of each responsive item are received at the  
9 above-referenced address on or before the specified production date. Any such production of  
10 copies is without prejudice to Propounding Party’s right to inspect and/or copy the original of each  
11 DOCUMENT or tangible thing at a future date.

12 2. These Requests seek the production of DOCUMENTS, and electronically stored  
13 information (“ESI”), in their native format, unless some other format is agreed to in writing by  
14 Propounding Party’s counsel of record.

15 3. ESI must be produced with all “metadata” intact. (“Metadata” means the data  
16 embedded in electronic versions of a document that show how, when and by whom the document  
17 was created, accessed or modified.)

18 4. Any request for a DOCUMENT shall be construed to include any and all drafts,  
19 versions, or revisions of such DOCUMENT.

20 5. These Requests seek the production of all responsive DOCUMENTS within YOUR  
21 possession, custody, or control, regardless of whether such DOCUMENTS are possessed directly  
22 by YOU.

23 6. In the event any DOCUMENTS responsive to these Requests are withheld from  
24 production based upon a claim of attorney-client privilege, attorney work-product doctrine, or any  
25 other privilege or protection from discovery, YOU are requested to provide a privilege log in  
26 which YOU explain the basis of the privilege or other protection you are claiming, and provide a  
27 description of the DOCUMENTS YOU are withholding sufficient to support the basis for  
28 withholding the DOCUMENTS.

7. The conjunctive “and” should be interpreted in the disjunctive to include the term “or” and vice versa.

8. The singular form of a word should be interpreted in the plural and vice versa.

9. If YOUR response to any Request is that the DOCUMENTS are not in YOUR possession, custody, or control, describe in detail the efforts YOU made to locate such DOCUMENTS.

10. If any responsive DOCUMENT was at one time in YOUR possession, custody, or control, but has been disposed of, lost, discarded, destroyed, or is no longer in YOUR possession, custody, or control for any other reason, then do the following with respect to each and every such DOCUMENT:

a. describe the nature of the DOCUMENT, letter or memorandum;

b. state the date of the DOCUMENT;

c. identify the PERSONS who sent and received the original and copies of the DOCUMENT, specifying its author, addressee, and all PERSONS to whom copies were furnished, or saw same;

d. state in as much detail as possible the subject matter and contents of the DOCUMENT; and

e. state when the DOCUMENT was in YOUR possession, custody, or control.

If objection is made to any part of a particular Request, that part should be specified in writing (together with the grounds for the objection), and any other portion of the Request to which no objection is made should be answered.

## REQUESTS FOR PRODUCTION

**REQUEST FOR PRODUCTION NO. 1:**

All DOCUMENTS maintained by YOU that contain the name of plaintiff Asta Jonasson.

**REQUEST FOR PRODUCTION NO. 2:**

All DOCUMENTS relating to plaintiff Asta Jonasson.

### REQUEST FOR PRODUCTION NO. 3:

All emails referring to plaintiff Asta Jonasson.

1 **REQUEST FOR PRODUCTION NO. 4:**

2 All emails sent between YOU and plaintiff Asta Jonasson.

3 **REQUEST FOR PRODUCTION NO. 5:**

4 All voicemail messages YOU received from plaintiff Asta Jonasson.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 All text messages YOU received from or sent to plaintiff Asta Jonasson.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 All audio recordings of plaintiff Asta Jonasson.

9 **REQUEST FOR PRODUCTION NO. 8:**

10 All video recordings of plaintiff Asta Jonasson.

11 **REQUEST FOR PRODUCTION NO. 9:**

12 All photographs of plaintiff Asta Jonasson.

13 **REQUEST FOR PRODUCTION NO. 10:**

14 All statements, declarations, and/or affidavits signed by YOU regarding the instant lawsuit.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 All unsigned drafts of statements, declarations, and/or affidavits reflecting YOUR name,  
17 regarding the instant lawsuit.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All notes or records relating to plaintiff Asta Jonasson.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 All text messages YOU received relating to plaintiff Asta Jonasson.

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1 **REQUEST FOR PRODUCTION NO. 14:**

2 All text messages YOU sent relating to plaintiff Asta Jonasson.

3  
4 DATED: May 13, 2025

GREENBERG GROSS LLP

5  
6 By:



7 Brian L. Williams

8 Jemma E. Dunn

9 Matthew T. Hale

10 Attorneys for Plaintiff Asta Jonasson

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On May 13, 2025, I served true copies of the following document(s) described as **AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.  
Sean M. Hardy, Esq.  
Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Emails: bfreedman@lftcllp.com;  
smhardy@lftcllp.com;  
jsunshine@lftcllp.com;  
vbirtha@lftcllp.com;  
cpuello@lftcllp.com;

Attorneys for Defendants Once Race Films, Inc.,  
One Race Production, Inc., Vin Diesel f/k/a Mark  
Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 13, 2025, at Los Angeles, California.



Hazelle T Nunez

# **EXHIBIT 10**



1 LINER FREEDMAN TAITELMAN + COOLEY, LLP  
2 Bryan J. Freedman, Esq. (SBN 151990)  
3 Sean M. Hardy, Esq. (SBN 266466)  
4 Jason Sunshine (SBN 336062)  
5 1801 Century Park East, 5th Floor  
6 Los Angeles, CA 90067  
7 Tel: (310) 201-0005  
8 bfreedman@lftcllp.com  
9 smhardy@lftcllp.com  
10 jsunshine@lftcllp.com

11 Attorneys for Defendant  
12 VIN DIESEL (F/K/A MARK SINCLAIR VINCENT)

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

vs.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an  
individual; SAMANTHA VINCENT, an  
individual; ONE RACE PRODUCTIONS,  
INC., a California corporation; ONE RACE  
FILMS, INC., a California corporation; and  
DOES 1 to 20, inclusive,

Defendants.

Case No.: 23STCV31143

[Assigned for all purposes to Judge Daniel M.  
Crowley, Dept. 71]

**OBJECTIONS TO AMENDED NOTICE  
OF DEPOSITION TO DEFENDANT VIN  
DIESEL (F/K/A MARK SINCLAIR  
VINCENT) AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

Date: June 24-25, 2025

Time: 9:00 a.m.

Place: Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Defendant Vin Diesel (“Defendant”), pursuant to *Code of Civil Procedure* section 2025.410, hereby objects to Plaintiff Asta Jonasson’s amended notice of the June 24 to June 25, 2025 deposition of Defendant (the “Notice”), on the following grounds:

**I.**

**OBJECTIONS TO NOTICE OF DEPOSITION**

1. The Defendant is no longer available to attend on the date and time specified in the Notice.

2. The deposition was improperly noticed to require Defendant’s in-person attendance at the offices of Plaintiff’s counsel in the presence of a deposition officer. Defendant objects and elects pursuant to Code of Civil Procedure Section 2025.310(a), that any deposition proceed via remote means, that the deposition officer not be physically present at the time of the deposition, and that Defendant not be physically present at the time of the deposition.

3. Defendant objects to the Notice to the extent the deposition is noticed for a location more than 150 miles from Defendant’s residence, in violation of *Code of Civil Procedure* section 2025.250, subsection (a) and Code of Civil Procedure section 1989. See generally Toyota Motor Corp. v. Superior Court (2011) 197 Cal.App.4th 1107.

4. Defendant objects to the Notice in that it violates the seven-hour limitation on the length of a deposition mandated by *Code of Civil Procedure* section 2025.290. The Notice improperly requires that the deposition to continue “day-to-day” until completed. The Notice improperly calls for Defendant’s deposition on two consecutive dates. The burden on Defendant of an endless deposition outweighs the needs of the case.

5. Defendant objects to the notice of deposition in that it is reasonably calculated to result in the disclosure of sensitive, proprietary, or confidential business information or trade secrets. Defendant objects into any inquiry into matters protected by Defendant’s right to privacy, including without limitation Defendant’s sexual history and financial condition. Defendant is entitled to a protective order pursuant to Code of Civil Procedure Section 2025.420 and Civil Code Section 3295 to prevent inquiry into improper subject matter and topics.

8. Defendant objects that the deposition was noticed for a period in which a dispositive motion is pending. Good cause exists to stay any deposition until after a ruling on such motion. Silver v. City of Los Angeles (1966) 245 Cal. App. 2d 673; Terminals Equip. Co. v. City (1990) 221 Cal.App.3d 234, 247.

## INTRODUCTORY STATEMENT REGARDING REQUESTS FOR PRODUCTION

No incidental or implied admissions are intended by the responses herein. The fact that Defendant has supplied, or has agreed to supply, or hereafter agree to supply, a document or thing in response to any request should not be taken as an admission that the Defendant accepts or admits the existence of any facts set forth or assumed by such request or in said document, or that such document or thing constitutes admissible evidence. The fact that Defendant has supplied, or has agreed to supply, or hereafter agrees to supply any document or thing in response to any request is not intended to be and shall not be construed to be a waiver of any part of any objection to any such request, or any part of any General Objection.

The responses herein only apply to those documents or things currently in Defendant's possession. Defendant has not completed investigation of the facts relating to this matter, completed discovery in this matter, or completed preparation for trial in this matter. Accordingly,

1 Defendant reserve all rights with respect to documents or things which may be subsequently  
2 located or discovered, including, without limitation, the right to use such documents at trial, and  
3 further reserves any and all rights and any and all objections to any responsive documents or  
4 things which may hereafter come into Defendant's possession, or which hereafter may be  
5 determined to be within the scope of any such request. Defendant disclaims any legal obligation  
6 to supplement the responses herein.

7 **III.**

8 **GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION**

9 1. Objection: Defendant objects to the production and inspection of documents at  
10 the offices of Plaintiff's counsel at their own expense. Defendant may be unable to locate all  
11 requested documents by the date specified for production and, therefore, a mutually convenient  
12 time and date can be ascertained by contacting the undersigned to make appropriate arrangement.  
13 Should Defendant in the future locate any relevant requested documents now in existence but not  
14 yet located, Defendant will so advise counsel for Plaintiff, subject to the objections and comments  
15 set forth in these responses.

16 2. Objection: Defendant objects to the instructions to the extent that they conflict  
17 with the provisions of Code of Civil Procedure section 2031.010, et seq., or seek to impose  
18 additional obligations upon Defendant beyond those set forth under Code of Civil Procedure  
19 section 2031.010. Defendant will respond within the requirements of Code of Civil Procedure  
20 section 2031.010, et seq.

21 3. Objection: Defendant objects to each and every request to the extent that it  
22 requires the production of documents or things, which have previously been made available to the  
23 Plaintiff, are equally available to the Plaintiff, or are public records.

24 4. Objection: Defendant objects to each and every request to the extent it seeks  
25 original documents, except where there is a legitimate dispute as to the legibility or authenticity of  
26 a copy.

27 5. Objection: to each and every request to the extent it seeks the production of  
28 documents or things not in the possession, custody or control of Defendant. Defendant would

1 produce only those documents or things, if any, in the possession of Defendant, and would  
2 produce documents, if any, in the manner kept by Defendant the usual course of business.

3 6. Objection: Defendant objects to the definitions contained in the requests in that  
4 they are incomplete, vague, ambiguous, unintelligible, overbroad and oppressive, and seek to  
5 impose obligations on Defendant beyond those imposed by the California Code of Civil  
6 Procedure.

7 7. Objection: Defendant objects to each request to the extent that it seeks  
8 information protected from disclosure by the attorney client privilege, the attorney work product  
9 doctrine, the common interest privilege, the joint defense privilege or any other applicable  
10 privilege or doctrine. Nothing herein is intended to be, nor shall in any way be construed as, a  
11 waiver of any attorney-client privilege, work product doctrine, the common interest privilege, the  
12 joint defense privilege or any other applicable privilege or doctrine. To the extent any request  
13 may be construed as calling for disclosure of information protected by such privilege or doctrine, a  
14 continuing objection to such Request is hereby interposed. No such privileged information will be  
15 provided. In the event any privileged information is provided in connection with these responses,  
16 such disclosure is inadvertent and is not intended to be, and shall not be deemed, a waiver of such  
17 privilege.

18 8. Objection: Defendant objects to each request to the extent it seeks information  
19 that is confidential, proprietary, a trade secret or private, or otherwise calls for information  
20 protected by the right of privacy contained in Article I, Section 1 of the Constitution of the State of  
21 California, in the United States Constitution or any other applicable privilege or protection  
22 recognized under statute or applicable case law.

23 9. Objection: Defendant objects to each and every request to the extent it seeks  
24 information that may violate the financial privacy rights of Defendant, third parties and individuals  
25 who are protected under the California Constitution.

26 10. Objection: Defendant objects to each request to the extent it seeks information  
27 not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery  
28 of admissible evidence and would subject Defendant to oppression, harassment, and undue burden

1 and expense not commensurate with any legitimate discovery need.

2 11. Objection: Defendant further objects to each request to the extent that it seeks a  
3 legal conclusion and/or an expert opinion.

4 12. Objection: Defendant objects to each request to the extent that it seeks  
5 information already in the possession, custody, or control of Plaintiff.

6 13. Objection: Defendant objects to each request to the extent it is argumentative  
7 and without any foundation.

8 14. Objection: Defendant objects to each request to the extent it seeks the  
9 production, identification, or disclosure of documents or information for periods of time other than  
10 periods relevant to the claims in the Complaint, or other than periods of time properly subject to  
11 discovery.

12 15. Objection: Defendant objects to each request to the extent it seeks the  
13 disclosure of sensitive, proprietary, or confidential business information or trade secrets.

14 16. Objection: Defendant objects to each request to the extent that it seeks the  
15 production, identification, or disclosure of documents or information that are not limited in time or  
16 scope.

17 17. Objection: Defendant objects to each request on the grounds it requests  
18 Defendant to search electronically-stored information ("ESI") without regard to whether the ESI is  
19 reasonably accessible, or whether it would impose an undue burden or cost to search, review, and  
20 produced the ESI.

21 18. Objection: Because Defendant have not concluded their discovery and  
22 investigation in this action, they specifically reserve the right to amend and/or supplement their  
23 responses to the requests.

24 19. Objection: Defendant objects to the 14 requests for production of documents,  
25 and each of them. Plaintiff served the requests for production of documents on April 7, 2025 by  
26 electronic service. Such a time frame is insufficient under the *California Code of Civil Procedure*,  
27 which contemplates 32 days when responding to document requests served by electronic service.  
28 *See* Cal. Code Civ. Proc. §§ 2031.260; 1013(e).

20. Objection: Defendant objects to the definition of “DOCUMENTS” to the extent that it conflicts with the provisions of *Evidence Code* section 250 and/or the *Code of Civil Procedure* section 2031.010, *et seq.*, or seek to impose additional obligation upon Defendant beyond those set forth under *Code of Civil Procedure* section 2031.010.

21. Objection: Defendant objects to the definition of the term “DOCUMENT(S)” to the extent that it is vague, ambiguous, and overbroad.

22. Objection: Defendant objects to the definition of the term “COMMUNICATION(S)” to the extent that it is vague, ambiguous, and overbroad.

23. Objection: Defendant objects to the definition of the term “YOU” to the extent that it is vague, ambiguous, and overbroad.

25. Objection: Defendant objects to the definition of the term “YOUR” to the extent that it is vague, ambiguous, and overbroad.

Defendant incorporates by reference these general objections to each response below.

**IV.**

**OBJECTIONS TO REQUESTS FOR PRODUCTION OF DOCUMENTS**

**OBJECTION TO REQUEST FOR PRODUCTION NO. 1:**

Defendant incorporates the Preliminary Statement and General Objections as though fully set forth herein.

Defendant objects to the request on the grounds that it seeks documents from a remote time period.

Defendant objects to the request on the grounds that it seeks documents and communications protected by the attorney-client privilege, work product doctrine (*See, Coito v. Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

Defendant objects to the request on the grounds that it seeks documents that contain confidential information protected by the right to privacy under the California or United States Constitution or applicable statutory or common law.

Defendant objects to the request on the grounds that it seeks documents that contain confidential business or proprietary information protected by trade secret.

Defendant objects to the request on the grounds that it seeks documents that are neither



1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seeks information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected



1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 2:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
12 confidential information protected by the right to privacy under the California or United States  
13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
19 documents to be inspected either by specifically describing each individual item or by reasonably  
20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
28 electronically-stored information ("ESI") without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 3:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States

1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
18 the ESI.

19 Defendant objects to this request on the grounds it seek information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant's financial condition in violation of California Civil Code § 3295.

1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 4:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
16 confidential information protected by the right to privacy under the California or United States  
17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
23 documents to be inspected either by specifically describing each individual item or by reasonably  
24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*

1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 5:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and

1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.

1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 6:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.



(See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

Defendant objects to the request on the grounds that to comply with the request would be an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the Defendant.

Defendant objects to this request on the grounds it requests Defendant to search electronically-stored information (“ESI”) without regard to whether the ESI is reasonably accessible, or whether it would impose an undue burden or cost to search, review, and produce the ESI.

Defendant objects to this request on the grounds it seeks information of Defendant and third parties that is protected by the right to privacy.

Defendant objects to the request on the grounds that it is overly broad and unduly burdensome.

Defendant objects to the request on the grounds that it is vague, ambiguous and unintelligible.

Defendant objects to the request on the grounds that it is redundant with and duplicative of other discovery propounded by Plaintiff to Defendant in this litigation.

Defendant objects to the request on the grounds that it improperly seeks discovery relating to Defendant’s financial condition in violation of California Civil Code § 3295.

Defendant objects to the request on the ground that it improperly seeks discovery relating to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114 Cal.App.4th 475, 480-481.

Defendant objects to the request to the extent it seeks the production of records protected by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

#### **OBJECTION TO REQUEST FOR PRODUCTION NO. 7:**

Defendant incorporates the Preliminary Statement and General Objections as though fully



1 set forth herein.

2 Defendant objects to the request on the grounds that it seeks documents from a remote time  
3 period.

4 Defendant objects to the request on the grounds that it seeks documents and  
5 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
6 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

7 Defendant objects to the request on the grounds that it seeks documents that contain  
8 confidential information protected by the right to privacy under the California or United States  
9 Constitution or applicable statutory or common law.

10 Defendant objects to the request on the grounds that it seeks documents that contain  
11 confidential business or proprietary information protected by trade secret.

12 Defendant objects to the request on the grounds that it seeks documents that are neither  
13 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

14 Defendant objects to the request on the grounds that the request fails to designate the  
15 documents to be inspected either by specifically describing each individual item or by reasonably  
16 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
17 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
18 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

19 Defendant objects to the request on the grounds that to comply with the request would be  
20 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
21 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
22 Defendant.

23 Defendant objects to this request on the grounds it requests Defendant to search  
24 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
25 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
26 the ESI.

27 Defendant objects to this request on the grounds it seek information of Defendant and third  
28 parties that is protected by the right to privacy.

1 Defendant objects to the request on the grounds that it is overly broad and unduly  
2 burdensome.

3 Defendant objects to the request on the grounds that it is vague, ambiguous and  
4 unintelligible.

5 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
6 other discovery propounded by Plaintiff to Defendant in this litigation.

7 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
8 to Defendant's financial condition in violation of California Civil Code § 3295.

9 Defendant objects to the request on the ground that it improperly seeks discovery relating  
10 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
11 Cal.App.4th 475, 480-481.

12 Defendant objects to the request to the extent it seeks the production of records protected  
13 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
14 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

15 **OBJECTION TO REQUEST FOR PRODUCTION NO. 8:**

16 Defendant incorporates the Preliminary Statement and General Objections as though fully  
17 set forth herein.

18 Defendant objects to the request on the grounds that it seeks documents from a remote time  
19 period.

20 Defendant objects to the request on the grounds that it seeks documents and  
21 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
22 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

23 Defendant objects to the request on the grounds that it seeks documents that contain  
24 confidential information protected by the right to privacy under the California or United States  
25 Constitution or applicable statutory or common law.

26 Defendant objects to the request on the grounds that it seeks documents that contain  
27 confidential business or proprietary information protected by trade secret.

28 Defendant objects to the request on the grounds that it seeks documents that are neither

1 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

2 Defendant objects to the request on the grounds that the request fails to designate the  
3 documents to be inspected either by specifically describing each individual item or by reasonably  
4 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
5 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
6 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

7 Defendant objects to the request on the grounds that to comply with the request would be  
8 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
9 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
10 Defendant.

11 Defendant objects to this request on the grounds it requests Defendant to search  
12 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
13 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
14 the ESI.

15 Defendant objects to this request on the grounds it seek information of Defendant and third  
16 parties that is protected by the right to privacy.

17 Defendant objects to the request on the grounds that it is overly broad and unduly  
18 burdensome.

19 Defendant objects to the request on the grounds that it is vague, ambiguous and  
20 unintelligible.

21 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
22 other discovery propounded by Plaintiff to Defendant in this litigation.

23 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
24 to Defendant’s financial condition in violation of California Civil Code § 3295.

25 Defendant objects to the request on the ground that it improperly seeks discovery relating  
26 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
27 Cal.App.4th 475, 480-481.

28 Defendant objects to the request to the extent it seeks the production of records protected

1 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
 2 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

3 **OBJECTION TO REQUEST FOR PRODUCTION NO. 9:**

4 Defendant incorporates the Preliminary Statement and General Objections as though fully  
 5 set forth herein.

6 Defendant objects to the request on the grounds that it seeks documents from a remote time  
 7 period.

8 Defendant objects to the request on the grounds that it seeks documents and  
 9 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
 10 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

11 Defendant objects to the request on the grounds that it seeks documents that contain  
 12 confidential information protected by the right to privacy under the California or United States  
 13 Constitution or applicable statutory or common law.

14 Defendant objects to the request on the grounds that it seeks documents that contain  
 15 confidential business or proprietary information protected by trade secret.

16 Defendant objects to the request on the grounds that it seeks documents that are neither  
 17 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

18 Defendant objects to the request on the grounds that the request fails to designate the  
 19 documents to be inspected either by specifically describing each individual item or by reasonably  
 20 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
 21 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
 22 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

23 Defendant objects to the request on the grounds that to comply with the request would be  
 24 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
 25 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 26 Defendant.

27 Defendant objects to this request on the grounds it requests Defendant to search  
 28 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably

1 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
2 the ESI.

3 Defendant objects to this request on the grounds it seeks information of Defendant and third  
4 parties that is protected by the right to privacy.

5 Defendant objects to the request on the grounds that it is overly broad and unduly  
6 burdensome.

7 Defendant objects to the request on the grounds that it is vague, ambiguous and  
8 unintelligible.

9 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
10 other discovery propounded by Plaintiff to Defendant in this litigation.

11 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
12 to Defendant's financial condition in violation of California Civil Code § 3295.

13 Defendant objects to the request on the ground that it improperly seeks discovery relating  
14 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
15 Cal.App.4th 475, 480-481.

16 Defendant objects to the request to the extent it seeks the production of records protected  
17 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
18 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

19 **OBJECTION TO REQUEST FOR PRODUCTION NO. 10:**

20 Defendant incorporates the Preliminary Statement and General Objections as though fully  
21 set forth herein.

22 Defendant objects to the request on the grounds that it seeks documents from a remote time  
23 period.

24 Defendant objects to the request on the grounds that it seeks documents and  
25 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
26 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

27 Defendant objects to the request on the grounds that it seeks documents that contain  
28 confidential information protected by the right to privacy under the California or United States

1 Constitution or applicable statutory or common law.

2 Defendant objects to the request on the grounds that it seeks documents that contain  
3 confidential business or proprietary information protected by trade secret.

4 Defendant objects to the request on the grounds that it seeks documents that are neither  
5 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

6 Defendant objects to the request on the grounds that the request fails to designate the  
7 documents to be inspected either by specifically describing each individual item or by reasonably  
8 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
9 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
10 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

11 Defendant objects to the request on the grounds that to comply with the request would be  
12 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
13 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
14 Defendant.

15 Defendant objects to this request on the grounds it requests Defendant to search  
16 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
17 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
18 the ESI.

19 Defendant objects to this request on the grounds it seek information of Defendant and third  
20 parties that is protected by the right to privacy.

21 Defendant objects to the request on the grounds that it is overly broad and unduly  
22 burdensome.

23 Defendant objects to the request on the grounds that it is vague, ambiguous and  
24 unintelligible.

25 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
26 other discovery propounded by Plaintiff to Defendant in this litigation.

27 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
28 to Defendant’s financial condition in violation of California Civil Code § 3295.

1 Defendant objects to the request on the ground that it improperly seeks discovery relating  
2 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
3 Cal.App.4th 475, 480-481.

4 Defendant objects to the request to the extent it seeks the production of records protected  
5 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
6 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

7 **OBJECTION TO REQUEST FOR PRODUCTION NO. 11:**

8 Defendant incorporates the Preliminary Statement and General Objections as though fully  
9 set forth herein.

10 Defendant objects to the request on the grounds that it seeks documents from a remote time  
11 period.

12 Defendant objects to the request on the grounds that it seeks documents and  
13 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
14 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

15 Defendant objects to the request on the grounds that it seeks documents that contain  
16 confidential information protected by the right to privacy under the California or United States  
17 Constitution or applicable statutory or common law.

18 Defendant objects to the request on the grounds that it seeks documents that contain  
19 confidential business or proprietary information protected by trade secret.

20 Defendant objects to the request on the grounds that it seeks documents that are neither  
21 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

22 Defendant objects to the request on the grounds that the request fails to designate the  
23 documents to be inspected either by specifically describing each individual item or by reasonably  
24 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
25 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
26 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

27 Defendant objects to the request on the grounds that to comply with the request would be  
28 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*



1 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
2 Defendant.

3 Defendant objects to this request on the grounds it requests Defendant to search  
4 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
5 accessible, or whether it would impose an undue burden or cost to search, review, and produce  
6 the ESI.

7 Defendant objects to this request on the grounds it seeks information of Defendant and third  
8 parties that is protected by the right to privacy.

9 Defendant objects to the request on the grounds that it is overly broad and unduly  
10 burdensome.

11 Defendant objects to the request on the grounds that it is vague, ambiguous and  
12 unintelligible.

13 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
14 other discovery propounded by Plaintiff to Defendant in this litigation.

15 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
16 to Defendant’s financial condition in violation of California Civil Code § 3295.

17 Defendant objects to the request on the ground that it improperly seeks discovery relating  
18 to Defendant’s confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
19 Cal.App.4th 475, 480-481.

20 Defendant objects to the request to the extent it seeks the production of records protected  
21 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
22 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

23 **OBJECTION TO REQUEST FOR PRODUCTION NO. 12:**

24 Defendant incorporates the Preliminary Statement and General Objections as though fully  
25 set forth herein.

26 Defendant objects to the request on the grounds that it seeks documents from a remote time  
27 period.

28 Defendant objects to the request on the grounds that it seeks documents and



1 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
2 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

3 Defendant objects to the request on the grounds that it seeks documents that contain  
4 confidential information protected by the right to privacy under the California or United States  
5 Constitution or applicable statutory or common law.

6 Defendant objects to the request on the grounds that it seeks documents that contain  
7 confidential business or proprietary information protected by trade secret.

8 Defendant objects to the request on the grounds that it seeks documents that are neither  
9 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

10 Defendant objects to the request on the grounds that the request fails to designate the  
11 documents to be inspected either by specifically describing each individual item or by reasonably  
12 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
13 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
14 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

15 Defendant objects to the request on the grounds that to comply with the request would be  
16 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
17 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
18 Defendant.

19 Defendant objects to this request on the grounds it requests Defendant to search  
20 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
21 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
22 the ESI.

23 Defendant objects to this request on the grounds it seek information of Defendant and third  
24 parties that is protected by the right to privacy.

25 Defendant objects to the request on the grounds that it is overly broad and unduly  
26 burdensome.

27 Defendant objects to the request on the grounds that it is vague, ambiguous and  
28 unintelligible.

1 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
2 other discovery propounded by Plaintiff to Defendant in this litigation.

3 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
4 to Defendant's financial condition in violation of California Civil Code § 3295.

5 Defendant objects to the request on the ground that it improperly seeks discovery relating  
6 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
7 Cal.App.4th 475, 480-481.

8 Defendant objects to the request to the extent it seeks the production of records protected  
9 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
10 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

11 **OBJECTION TO REQUEST FOR PRODUCTION NO. 13:**

12 Defendant incorporates the Preliminary Statement and General Objections as though fully  
13 set forth herein.

14 Defendant objects to the request on the grounds that it seeks documents from a remote time  
15 period.

16 Defendant objects to the request on the grounds that it seeks documents and  
17 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
18 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

19 Defendant objects to the request on the grounds that it seeks documents that contain  
20 confidential information protected by the right to privacy under the California or United States  
21 Constitution or applicable statutory or common law.

22 Defendant objects to the request on the grounds that it seeks documents that contain  
23 confidential business or proprietary information protected by trade secret.

24 Defendant objects to the request on the grounds that it seeks documents that are neither  
25 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

26 Defendant objects to the request on the grounds that the request fails to designate the  
27 documents to be inspected either by specifically describing each individual item or by reasonably  
28 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.

1 (See *Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; see also  
 2 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

3 Defendant objects to the request on the grounds that to comply with the request would be  
 4 an undue burden and expense on the Defendant. (See *Calcor Space Facility, Inc. v. Superior Court*  
 5 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
 6 Defendant.

7 Defendant objects to this request on the grounds it requests Defendant to search  
 8 electronically-stored information (“ESI”) without regard to whether the ESI is reasonably  
 9 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
 10 the ESI.

11 Defendant objects to this request on the grounds it seek information of Defendant and third  
 12 parties that is protected by the right to privacy.

13 Defendant objects to the request on the grounds that it is overly broad and unduly  
 14 burdensome.

15 Defendant objects to the request on the grounds that it is vague, ambiguous and  
 16 unintelligible.

17 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
 18 other discovery propounded by Plaintiff to Defendant in this litigation.

19 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
 20 to Defendant’s financial condition in violation of California Civil Code § 3295.

21 Defendant objects to the request on the ground that it improperly seeks discovery relating  
 22 to Defendant’s confidential financial affairs. See *Fortunato v. Superior Court* (2003) 114  
 23 Cal.App.4th 475, 480-481.

24 Defendant objects to the request to the extent it seeks the production of records protected  
 25 by the taxpayer privilege. See *Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; see also  
 26 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

27 ///

28 ///

1 **OBJECTION TO REQUEST FOR PRODUCTION NO. 14:**

2 Defendant incorporates the Preliminary Statement and General Objections as though fully  
3 set forth herein.

4 Defendant objects to the request on the grounds that it seeks documents from a remote time  
5 period.

6 Defendant objects to the request on the grounds that it seeks documents and  
7 communications protected by the attorney-client privilege, work product doctrine (*See, Coito v.*  
8 *Superior Ct.*, 54 Cal.4th 480 (2012)), or other applicable privilege.

9 Defendant objects to the request on the grounds that it seeks documents that contain  
10 confidential information protected by the right to privacy under the California or United States  
11 Constitution or applicable statutory or common law.

12 Defendant objects to the request on the grounds that it seeks documents that contain  
13 confidential business or proprietary information protected by trade secret.

14 Defendant objects to the request on the grounds that it seeks documents that are neither  
15 relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence.

16 Defendant objects to the request on the grounds that the request fails to designate the  
17 documents to be inspected either by specifically describing each individual item or by reasonably  
18 particularizing each category of item as required by *Code of Civil Procedure* section 2031.030.  
19 (*See Calcor Space Facility, Inc. v. Superior Court* (1997) 53 Cal.App.4th 216, 221-223; *see also*  
20 *Flora Crane Service, Inc. v. Superior Court* (1964) 234 Cal.App.2d 767, 786-787.)

21 Defendant objects to the request on the grounds that to comply with the request would be  
22 an undue burden and expense on the Defendant. (*See Calcor Space Facility, Inc. v. Superior Court*  
23 (1997) 53 Cal.App.4th 216, 225-226.) The request is calculated to annoy and harass the  
24 Defendant.

25 Defendant objects to this request on the grounds it requests Defendant to search  
26 electronically-stored information ("ESI") without regard to whether the ESI is reasonably  
27 accessible, or whether it would impose an undue burden or cost to search, review, and produced  
28 the ESI.

1 Defendant objects to this request on the grounds it seek information of Defendant and third  
2 parties that is protected by the right to privacy.

3 Defendant objects to the request on the grounds that it is overly broad and unduly  
4 burdensome.

5 Defendant objects to the request on the grounds that it is vague, ambiguous and  
6 unintelligible.

7 Defendant objects to the request on the grounds that it is redundant with and duplicative of  
8 other discovery propounded by Plaintiff to Defendant in this litigation.

9 Defendant objects to the request on the grounds that it improperly seeks discovery relating  
10 to Defendant's financial condition in violation of California Civil Code § 3295.

11 Defendant objects to the request on the ground that it improperly seeks discovery relating  
12 to Defendant's confidential financial affairs. *See Fortunato v. Superior Court* (2003) 114  
13 Cal.App.4th 475, 480-481.

14 Defendant objects to the request to the extent it seeks the production of records protected  
15 by the taxpayer privilege. *See Sav-On Drug Stores v. Superior Court* (1975) 15 Cal.3d 1; *see also*  
16 *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.

17  
18 DATED: June 20, 2025

LINER FREEDMAN TAITELMAN + COOLEY,  
LLP

19  
20 

21 By: \_\_\_\_\_  
22 Bryan J. Freedman, Esq.  
23 Sean M. Hardy, Esq.  
24 Jason H. Sunshine, Esq.  
25 Attorneys for Defendant  
26 VIN DIESEL (F/K/A MARK SINCLAIR  
27 VINCENT)  
28

**PROOF OF SERVICE**

**STATE OF CALIFORNIA** |  
| ss.  
**COUNTY OF LOS ANGELES** |

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business is EXPRESS NETWORK, LLC, 1605 W. Olympic Blvd, Suite 800, Los Angeles, CA 90015.

On June 20, 2025, I served the foregoing document(s) described:

**OBJECTIONS TO AMENDED NOTICE OF DEPOSITION TO DEFENDANT VIN DIESEL (F/K/A MARK SINCLAIR VINCENT) AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross LLP  
601 S. Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017  
*Attorneys for Plaintiff Asta Jonasson*

☒ **By Personal Service.** I personally delivered the above listed documents to the persons at the addresses listed above.

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

Daniel Chaver  
Print Name (Messenger)

[Signature]  
Signature of Declarant (Messenger)



**STATE OF CALIFORNIA**                 ]  
  ]ss.  
**COUNTY OF LOS ANGELES**         ]

On June 20, 2025, I served the foregoing document(s) described:

on the interested parties in this action ☒ by placing ☐ the original ☐ a true copy thereof  
enclosed in seal envelopes addressed as follows:

Brian L. Williams  
Jemma E. Dunn  
Matthew T. Hale  
Greenberg Gross, LLP  
650 Town Center Dr, Ste 1700  
Costa Mesa, CA 92626-7025  
*Attorneys for Plaintiff Asta Jonasson*

☒ **State.** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on June 20, 2025 at Los Angeles, California.

EXPRESS NETWORK

Signature of Declarant (Messenger)

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# **EXHIBIT 11**

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**From:** Matthew T. Hale  
**Sent:** Friday, June 20, 2025 5:12 PM  
**To:** Bryan Freedman; Sean M. Hardy; Jason Sunshine  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha  
**Subject:** Jonasson v. Vin Diesel, et al

Counsel:

We are in receipt of defendant Vin Diesel's objections to Plaintiff's Amended Notice of Deposition and Requests for Production of Documents. For the first time since these dates (June 24 and 25) were provided by his counsel on May 9, 2025, and despite his agreement to appear in Los Angeles, Defendant Vin Diesel now suddenly asserts that he is not available to attend his duly noticed deposition. Please provide, by end of day this coming Monday June 23, 2025, multiple alternative dates for his deposition that fall on or before July 18th. Given the apparent gamesmanship and bad faith nature of this objection, if we do not receive these multiple dates by Monday, we will move forward with a Motion to Compel Vin Diesel's deposition and will take a notice of non-appearance on Tuesday. As to the remainder of Defendant's objections, please see the below:

2. Mr. Diesel's objection regarding in-person attendance misinterprets the CCP § 2025.310. The deponent cannot simply elect to be separate from the attorney taking the deposition. It is the attorney or party's election to physically present at the location of the deponent: "Subject to Section 2025.420, any party or attorney of record may, but is not required to, be physically present at the deposition at the location of the deponent."

3. Mr. Diesel again fails to even straightforwardly assert that he in fact lives more than 150 miles from our office in Downtown Los Angeles, where the deposition is to take place. Instead, Mr. Diesel again uses the qualifying language, "to the extent the deposition is noticed for a location more than 150 miles from Defendant's residence." Mr. Diesel's objection is so vague and uncertain as to operate as a waiver of any such objection. Furthermore, Samantha Vincent already confirmed that Mr. Diesel currently lives in Los Angeles.

4. There is no seven-hour limit applicable to employment cases, like this one. (CCP § 2025.290(b)(4)). Further, the notice does not assume any such time period.

5. Defendant asserts that he shouldn't have to attend his deposition because questions *may* be asked that implicate his privacy. Not only is this not a ground to forego attendance altogether, but also there is a protective order in this matter in place to protect truly confidential portions of the deposition.

6. There is absolutely no indication that Plaintiff's office, which has ample security staff and precautions, is inadequate to protect Mr. Diesel's personal safety and privacy.

7. The objection regarding a failure to comply with requirements of a deposition notice lacks any specificity as to what requirements the notice fails to comply with. This objection should be disregarded due to its ambiguity.

8. The objection incorrectly asserts that there is a dispositive motion pending.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)



# **EXHIBIT 12**

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**From:** Sean M. Hardy <smhardy@lftcllp.com>  
**Sent:** Monday, June 23, 2025 8:09 AM  
**To:** Matthew T. Hale  
**Cc:** Brian Williams; Jemma E. Dunn; Hazelle T. Nunez; Vaneta Birtha; Bryan Freedman; Jason Sunshine  
**Subject:** [EXT] RE: Jonasson v. Vin Diesel, et al

Counsel,

We respectfully disagree with your position below, and will meet and confer with you on this issue in person today at your office. Thank you.

Sincerely,

Sean M. Hardy

Sean M. Hardy, Esq.  
Partner  
LINER FREEDMAN TAITELMAN + COOLEY, LLP  
1801 Century Park West, 5th Floor  
Los Angeles, California 90067  
Telephone: (310) 201-0005  
Facsimile: (310) 201-0045  
Web: [www.ftllp.com](http://www.ftllp.com)

---

**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **DECLARATION OF MATTHEW T. HALE IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL DEFENDANT VIN DIESEL'S DEPOSITION & REQUEST FOR SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.	Attorneys for Defendants One Race Films, Inc.,
Sean M. Hardy, Esq.	One Race Productions, Inc., Vin Diesel f/k/a
Jason H. Sunshine, Esq.	Mark Sinclair Vincent, and Samantha Vincent

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor  
Los Angeles, CA 90067

Telephone: (310) 201-0005

Facsimile: (310) 201-0045

Emails: bfreedman@ftllp.com

smhardy@ftllp.com

jsunshine@ftllp.com

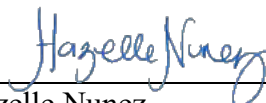
vbirtha@ftllp.com

cpuello@ftllp.com

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S  
PROPOSED ORDER TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Notice of Motion; Motion to Compel; Declaration of Matthew T. Hale]*

**[PROPOSED] ORDER**

The motion of Plaintiff Asta Jonasson (“Plaintiff”) for an order compelling Defendant Vin Diesel (“Defendant”) to appear for his deposition and granting sanctions, came on for hearing in Department 71 of the above-entitled court on August 11, 2025 at 8:30 a.m.

Having considered the arguments of the parties, the Court hereby **GRANTS** the Motion.

THE COURT HEREBY ORDERS that Defendant shall, within ten (10) days of this order, appear for his deposition at Plaintiff’s office at 601 S. Figueora Street, 30<sup>th</sup> Floor, Los Angeles, California 90017..

THE COURT FURTHER ORDERS that, pursuant to sections 2025.450(a), 2017.010, 2023.030(a), 2023.010(d), and 2023.010(e) of the Code of Civil Procedure, Defendant and its counsel shall, within thirty (30) days of this order, pay to Plaintiff monetary sanctions in the amount of \$7,455.07, which is the amount reasonably incurred by Plaintiff in connection with this motion.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Daniel M. Crowley  
Judge of the Superior Court





# Journal Technologies Court Portal

## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

### Fees

Description	Fee	Qty	Amount
Motion to Compel (name extension)	0.00	1	0.00
TOTAL			\$0.00

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

Print Receipt

Reserve Another Hearing

View My Reservations



**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S PROPOSED ORDER TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.

Sean M. Hardy, Esq.

Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor

Los Angeles, CA 90067

Telephone: (310) 201-0005

Facsimile: (310) 201-0045

Emails: bfreedman@ftllp.com

smhardy@ftllp.com

jsunshine@ftllp.com

vbirtha@ftllp.com

cpuello@ftllp.com

Attorneys for Defendants One Race Films, Inc.,  
One Race Productions, Inc., Vin Diesel f/k/a  
Mark Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez

BRIAN L. WILLIAMS, State Bar No. 227948  
BWilliams@GGTrialLaw.com  
JEMMA E. DUNN, State Bar No. 258454  
JDunn@GGTrialLaw.com  
MATTHEW T. HALE, State Bar No. 303826  
MHale@GGTrialLaw.com  
GREENBERG GROSS LLP  
601 S. Figueroa Street, 30th Floor  
Los Angeles, California 90017  
Telephone: (213) 334-7000  
Facsimile: (213) 334-7001

Attorneys for Plaintiff Asta Jonasson

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF LOS ANGELES**

ASTA JONASSON, an individual,

Plaintiff,

v.

VIN DIESEL (f/k/a Mark Sinclair Vincent), an individual; SAMANTHA VINCENT, an individual; ONE RACE PRODUCTIONS, INC., a California corporation; ONE RACE FILMS, INC., a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. 23STCV31143

Assigned for All Purposes to:  
Hon. Daniel M. Crowley, Dept. 71

**PLAINTIFF ASTA JONASSON'S NOTICE  
OF MOTION TO COMPEL THE  
DEPOSITION OF DEFENDANT VIN  
DIESEL AND REQUEST FOR  
SANCTIONS**

Reservation No.: 374377214511

**Hearing:**

Judge: Hon. Daniel M. Crowley  
Date: August 11, 2025  
Time: 8:30 a.m.  
Dept.: 71

Action Filed: December 21, 2023  
Trial Date: August 18, 2025

*[Filed Concurrently with Plaintiff's Motion to Compel; Declaration of Matthew T. Hale; [Proposed] Order]*

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on August 11, 2025, at 8:30 a.m., in Department 71 of  
 3 Stanley Mosk Courthouse at 111 N. Hill Street, Los Angeles, California 90012, or as soon thereafter  
 4 as the matter can be heard, plaintiff Asta Jonasson will and hereby does move the Court for an order  
 5 compelling Defendant Vin Diesel to appear for his deposition and for Defendant Vin Diesel and his  
 6 counsel, Liner Freedman Taitelman + Cooley to pay sanctions in the amount of \$7,455.07, which is  
 7 the amount reasonably incurred in connection with these proceedings.

8 Plaintiff moves to compel Defendant Vin Diesel's deposition after a pattern of evasion and  
 9 obstruction spanning over a year. Despite multiple notices, good faith efforts to accommodate his  
 10 schedule, and his counsel's express confirmation of availability for June 24-25, 2025, Defendant  
 11 served last-minute objections just four days before his scheduled deposition containing recycled,  
 12 meritless arguments. When Plaintiff's counsel attempted to meet and confer, Defendant's counsel  
 13 engaged in shocking misconduct, including profanity, threats of malicious prosecution, and physical  
 14 intimidation, while refusing to provide any legitimate explanation for Defendant's sudden  
 15 unavailability. Defendant's objections lack merit as they misinterpret applicable statutes, seek to  
 16 prevent discovery on topics central to Plaintiff's claims, and attempt to delay proceedings until after  
 17 trial through frivolous procedural maneuvers.

18 This motion will be based on the Code of Civil Procedure sections 2025.450(a), 2017.010,  
 19 2023.030(a), 2023.010(d), and 2023.010(e), the following Memorandum of Points and Authorities,  
 20 Declaration of Matthew T. Hale, and exhibits filed along with these papers, and other evidence to  
 21 be presented at the hearing on this motion.

22  
 23 DATED: June 26, 2025

GREENBERG GROSS LLP

24  
 25 By: /s/ Matthew T. Hale

26 Brian L. Williams

27 Jemma E. Dunn

Matthew T. Hale

28 Attorneys for Plaintiff Asta Jonasson



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## Make a Reservation

ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.

Case Number: 23STCV31143 Case Type: Civil Unlimited Category: Wrongful Termination

Date Filed: 2023-12-21 Location: Stanley Mosk Courthouse - Department 71

### Reservation

Case Name: ASTA JONASSON, AN INDIVIDUAL vs VIN DIESEL, et al.	Case Number: 23STCV31143
Type: Motion to Compel (Motion to Compel Party Deposition)	Status: RESERVED
Filing Party: Asta Jonasson (Plaintiff)	Location: Stanley Mosk Courthouse - Department 71
Date/Time: 08/11/2025 8:30 AM	Number of Motions: 1
Reservation ID: 374377214511	Confirmation Code: CR-FWVPEPZZCBUZ2FMFB

### Fees

Description	Fee	Qty	Amount
Motion to Compel (name extension)	0.00	1	0.00
TOTAL			\$0.00

### Payment

Amount: \$0.00	Type: NOFEE
Account Number: n/a	Authorization: n/a
Payment Date: n/a	

Print Receipt

Reserve Another Hearing

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**PROOF OF SERVICE**

**Asta Jonasson v. Vin Diesel (f/k/a Mark Sinclair Vincent), et al.  
Case No. 23STCV31143**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 601 S. Figueroa Street, 30th Floor, Los Angeles, CA 90017.

On June 26, 2025, I served true copies of the following document(s) described as **PLAINTIFF ASTA JONASSON'S NOTICE OF MOTION TO COMPEL THE DEPOSITION OF DEFENDANT VIN DIESEL AND REQUEST FOR SANCTIONS** on the interested parties in this action as follows:

Bryan J. Freedman, Esq.

Sean M. Hardy, Esq.

Jason H. Sunshine, Esq.

**LINER FREEDMAN & TAITELMAN +  
COOLEY, LLP**

1801 Century Park West, Fifth Floor

Los Angeles, CA 90067

Telephone: (310) 201-0005

Facsimile: (310) 201-0045

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smhardy@ftllp.com

jsunshine@ftllp.com

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Attorneys for Defendants One Race Films, Inc.,  
One Race Productions, Inc., Vin Diesel f/k/a  
Mark Sinclair Vincent, and Samantha Vincent

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address HNunez@GGTrialLaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 26, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Hazelle Nunez



# **EXHIBIT 14**

**Matthew T. Hale**

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**From:** Matthew T. Hale  
**Sent:** Thursday, June 26, 2025 9:37 AM  
**To:** Sean M. Hardy; Brian Williams; Jemma E. Dunn; Hazelle T. Nunez  
**Cc:** Bryan Freedman; Miles Cooley; Jason Sunshine; Joanna Rivera; Vaneta Birtha  
**Subject:** RE: Asta Jonasson v. Vin Diesel, et al., LASC Case No. 23STCV31143

Hi Sean,

Yes, we will be appearing and opposing the application. Please share the application documents as soon as possible.

Further, please be advised that pursuant to California Rules of Court, rule 3.1203(a), I am providing you with notice that Plaintiff will be presenting an *ex parte* application tomorrow morning. Plaintiff will also be presenting this *ex parte* application on Friday, June 27, 2025, at 8:30 a.m. in Department 71 of the Stanley Mosk Courthouse located at 111 North Hill Street, Los Angeles, California 90012. Plaintiff's *ex parte* application seeks an order compelling Defendant Vin Diesel to appear for his deposition, monetary sanctions against Defendant Vin Diesel and his counsel in the amount of \$5,330.07 for willful misuse of the discovery process, and alternatively, an Order Shortening Time regarding a noticed motion for the same relief. This application is necessitated by Defendant's failure to appear for his properly noticed deposition scheduled for June 24-25, 2025, despite previously confirming his availability. With fact discovery closing on July 18, 2025, and trial set for August 18, 2025, Defendant's continued evasion threatens irreparable prejudice to Plaintiff's ability to obtain essential testimony from Defendant Diesel.

Please confirm whether you intend to oppose this application and whether you will be appearing at the hearing.

**Matthew T. Hale**  
**Counsel - Assistant Director of Litigation | Greenberg Gross LLP**

One Summerlin | 1980 Festival Plaza Drive | Suite 730 | Las Vegas, NV 89135  
Direct 702.777.0891 | Main 702.777.0888  
[MHale@GGTrialLaw.com](mailto:MHale@GGTrialLaw.com)



Los Angeles | Orange County | Las Vegas | New York

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**From:** Sean M. Hardy <smhardy@lftcllp.com>  
**Sent:** Thursday, June 26, 2025 8:32 AM  
**To:** Brian Williams <BWilliams@GGTrialLaw.com>; Jemma E. Dunn <JDunn@GGTrialLaw.com>; Matthew T. Hale <MHale@GGTrialLaw.com>; Hazelle T. Nunez <HNunez@GGTrialLaw.com>  
**Cc:** Bryan Freedman <bfreedman@lftcllp.com>; Miles Cooley <mcooley@lftcllp.com>; Jason Sunshine <jsunshine@lftcllp.com>; Joanna Rivera <jrivera@lftcllp.com>; Vaneta Birtha <vbirtha@lftcllp.com>  
**Subject:** [EXT] RE: Asta Jonasson v. Vin Diesel, et al., LASC Case No. 23STCV31143

Counsel,

Please allow this message to provide notice pursuant to California Rules of Court, Rule 3.1204, that on June 27, 2025, at 8:30 A.M. in Department 71 of the Los Angeles Superior Court, located at 111 North Hill Street, Los Angeles, CA 90012, Defendants One Race Productions, Inc., One Race Films, Inc., Vin Diesel, and Samantha

Vincent (collectively, “Defendants”), by and through their counsel of record, will appear and apply *ex parte* to the Court for an Order: (1) that the current trial date of August 18, 2025, be vacated and continued to a date on or about November 17, 2025, or in accordance with the Court’s calendar; (2) that the current Final Status Conference date of August 8, 2025, be vacated and continued to a date on or about November 10, 2025, or in accordance with the Court’s calendar; and (3) that all related motion cut-off and pre-trial dates to comport with the new trial date and final status conference date.

Please advise if counsel for Plaintiff will be appearing and, if so, whether you will oppose the application. Thank you.

Sincerely,

Sean M. Hardy

Sean M. Hardy, Esq.  
Partner  
LINER FREEDMAN TAITELMAN + COOLEY, LLP  
1801 Century Park West, 5th Floor  
Los Angeles, California 90067  
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